

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF KANSAS

OLIVER BROWN, et al., )  
 )  
 ) Plaintiffs, )  
 )  
 ) and )  
 )  
 ) CHARLES and KIMBERLY SMITH, minor )  
 ) children, by their mother and next )  
 ) friend, LINDA BROWN SMITH, et al., ) No. T-316  
 )  
 ) Intervening )  
 ) Plaintiffs, )  
 )  
 ) vs. )  
 )  
 ) BOARD OF EDUCATION OF TOPEKA, )  
 ) SHAWNEE COUNTY, KANSAS, )  
 ) et al., )  
 )  
 ) Defendants. )  
 )

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RESPONSE OF UNIFIED SCHOOL DISTRICT NO. 501  
TO INTERVENING PLAINTIFFS'  
REQUEST FOR PRODUCTION OF DOCUMENTS

Intervening plaintiffs seek production of all studies or reports prepared in connection with any of the following federal programs:

- a. Title II (Drop-out rates)
- b. Title III (Reading Clinics)
- c. Handicapped Planning (Needs Assessment)
- d. Special Needs (Pre-Vocational Orientation)
- e. Kansas Correctional Vocational Training
- f. Communication Skills
- g. Pre-Vocational Exploratory (P.E.P.)

Documents requested by Item a have been destroyed. These records were removed from files when the Guidance Services Office of the School District was moved from 1601 Van Buren to the present location several years ago. This was done to conserve storage space in the new office in accordance with the instructions of the Superintendent to eliminate records no longer necessary for current operational needs.

The studies or reports identified in Item b which have been retained by Unified School District No. 501 will be made



available for inspection and copying by intervening plaintiffs' counsel at the office of the School District's attorneys, Eidson, Lewis, Porter & Haynes, 1300 Merchants National Bank Building, Topeka, Kansas.

With respect to the documents sought in Items c and d, no such studies or reports can be located. With respect to Item d, it does not appear that any reports or studies were ever prepared.

With respect to the documents sought in Item e, those reports or studies maintained by Unified School District No. 501 will be made available for inspection and copying by intervening plaintiffs' counsel at the office of the School District's attorneys, Eidson, Lewis, Porter & Haynes, 1300 Merchants National Bank Building, Topeka, Kansas.

With respect to the documents sought in Item f, it does not appear that any studies or reports were ever prepared.

With respect to the documents sought in Item g, such studies or reports maintained by Unified School District No. 501 will be made available for inspection and copying by intervening plaintiffs' counsel at the office of the School District's attorneys, Eidson, Lewis, Porter & Haynes, 1300 Merchants National Bank Building, Topeka, Kansas.

To the extent that the documents which are described in intervening plaintiffs' request exist, Unified School District No. 501 is willing to produce them for inspection by the intervening plaintiffs. However, where such reports or studies include personally identifiable information regarding students, the School District shall delete the student's name, social security number or other personally identifying information from the study or report prior to its disclosure.

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K. Gary Sebelius  
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Topeka, Kansas 66612  
(913) 233-2332

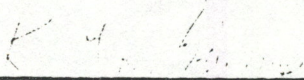
Attorneys for Unified School  
District No. 501



CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the above and foregoing RESPONSE OF UNIFIED SCHOOL DISTRICT NO. 501 TO INTERVENING PLAINTIFFS' REQUEST FOR PRODUCTION OF DOCUMENTS was served upon attorneys for intervening plaintiffs by depositing same in the United States mail, postage prepaid, this      day of June, 1981, addressed to:

Richard Jones  
605 S.E. Quincy, Suite 1  
Topeka, Kansas 66603

  
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K. Gary Sebelius