

EIDSON, LEWIS, PORTER & HAYNES

LAWYERS

1300 MERCHANTS NATIONAL BANK BUILDING

EIGHTH AND JACKSON STREETS

TOPEKA, KANSAS 66612

913-233-2332

PH. JAMES  
C. EIDSON

PHILIP H. LEWIS  
JAMES W. PORTER  
WILLIAM G. HAYNES  
CHARLES N. HENSON  
AUSTIN NOTHERN  
BROCK H. SNYDER  
CHARLES D. MCATEE  
DALE L. SOMERS  
K. GARY SEBELIUS  
RICHARD F. HAYSE  
RONALD W. FAIRCHILD  
JOHN H. WACHTER  
LARRY J. MUNDY  
ANNE L. BAKER  
JAMES P. RANKIN

March 30, 1982

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

RE: Brown v. Board of Education, et al.  
U.S.D.C. Kansas, No. T-316

Dear Rich:

In accordance with our telephone conversation of earlier this date, enclosed please find the original and two copies of the Order extending the time within which Unified School District No. 501 can answer or object to certain interrogatories contained in plaintiffs' second set and respond to the request for production of documents. Without undue burden on you, it would be appreciated if you would approve the order and see that the original is forwarded to the judge's office for his signature.

Also enclosed please find answers to Interrogatory Nos. 1, 3, 6, 10 and 11 of the second set. With respect to Interrogatory Nos. 4 and 5, we will need further clarification before answers can be provided. After reviewing these interrogatories with School District personnel, it appears that it is not clear what information is being sought by these interrogatories. Do these interrogatories relate only to those programs identified in Interrogatory No. 3 regarding CETA, Headstart and Follow Through programs?

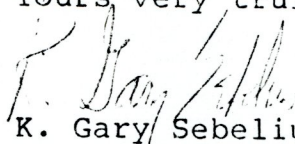
In addition, it is not clear whether the term "full time" is intended to mean full time equivalents or to specifically exclude all part time personnel from the information to be provided. Likewise, is the request for "total annual salaries" meant to be a cumulative total for each school or the total amount paid to each teacher for each school during the relevant time period? Do you want information regarding only those administrators who actually are assigned to individual schools or are you interested in information regarding administrators who have duties not relegated to only one school?

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It is not necessary that new, formally revised interrogatories for numbers 4 and 5 be submitted by you, but if you could indicate with more specificity the information you want, we will see that our response sets forth the specificity in the interrogatory question.

Again, I appreciate your cooperation in affording us an additional 30 days within which to respond to the outstanding discovery requests. Should you have any questions concerning this matter, please feel free to contact me at any time.

Yours, very truly,



K. Gary Sebelius  
of Eidson, Lewis, Porter & Haynes

KGS:tf  
Encls.