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.

ANSWER OF UNIFIED SCHOOL DISTRICT NO. 501
TO PLAINTIFF-INTERVENORS INTERROGATORY NOS. 8, 9 and 10
OF THE THIRD SET

8. Please describe how vocational programs have been and currently are being funded.

ANSWER:

Six unified school districts, including Unified School
District No. 501, through a cooperative effort, formed the Kaw
Area Vocational-Technical School in 1963. The cooperating school
districts are: Unified School District No. 336 - Holton; Unified
School District No. 338 - Valley Falls; Unified School District
No. 345 - Seaman; Unified School District No. 437 - Auburn/
Washburn Rural; Unified School District No. 450 - Shawnee
Heights; and Unified School District No. 501 - Topeka. The six
cooperating school districts contribute all their vocational
monies to the operation of the Kaw Area Vocational-Technical
School. The school also receives funding from the State for postsecondary aid and formula aid monies. Funding is also received
from federal formula aid monies. In addition, tuition is paid
by post-secondary students.

9. With relation to instructors within such vocational programs, are said instructors employees of the Board of Education or employees of another organization? If the latter, please provide names and address of employers.

ANSWER:

For administrative purposes, Unified School District No. 501 is the employer of the employees of the Kaw Area Vocational-Technical School.

10. Are said instructors' salaries paid in full by the Board of Education or by some other organization? If they are paid by someone other than the Board of Education, please provide name and address of said organization.

ANSWER:

Salaries are paid through Unified School District No. 501, but the monies funding these salaries come from the sources described in answer to Interrogatory No. 8. In regard to apprenticeship classes, the trade unions provide a portion of the instructors' salaries, and this is paid by the unions directly to the instructors.

VERIFICATION

STATE OF KANSAS)
) ss
COUNTY OF SHAWNEE)

The undersigned, of lawful age, being first duly sworn upon his oath, deposes and states:

That he is Director, Kaw Area Vocational-Technical School, for Unified School District No. 501, that he has read the answer to Interrogatory Nos. 8, 9 and 10 of Intervening Plaintiffs' Interrogatories--Third Set which was prepared under his general direction and supervision and such answer is true and correct to the best of his knowledge and belief.

Further affiant saith not.

Roy J Berry

Subscribed and sworn to before me this 29 day of October 1982.

Notary Public - Tina (N. Fay

my appointment expires: 4/24/83

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the above and foregoing ANSWER OF UNIFIED SCHOOL DISTRICT NO. 501 TO PLAINTIFF-INTERVENORS' INTERROGATORY NOS. 8, 9 and 10 OF THE THIRD SET was served by hand delivering the same this 29 day of October, 1982, to attorneys for Intervening Plaintiffs by serving Richard Jones, 605 S.E. Quincy, Suite 1, Topeka, Kansas 66603.

K. Gary Sebelius of Eidson, Lewis, Porter & Haynes 1300 Merchants National Bank Bldg. Topeka, Kansas 66612 (913) 233-2332

Attorneys for Unified School District No. 501