

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.,

Intervening  
Plaintiffs,

Case No. T-316

vs.

BOARD OF EDUCATION OF TOPEKA,  
SHAWNEE COUNTY, KANSAS,  
JOHN CARLIN, et al.,

Defendants

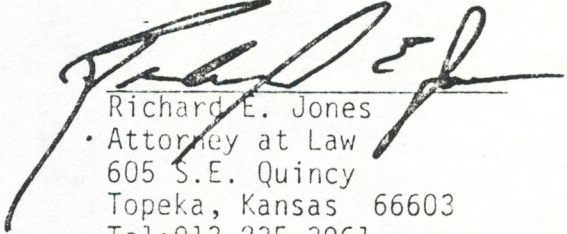
REQUEST FOR PRODUCTION OF DOCUMENTS  
DIRECTED TO DEFENDANT BOARD OF EDUCATION

Pursuant to Rule 34 of the Rules of Civil Procedure, Plaintiffs request that Defendant Board of Education produce at the office of the undersigned counsel within thirty days of service thereof, copies of the following documents:

1. All reports to the Office of Civil Rights of the Department of Education or its predecessor which identify the number and/or race of all students suspended or disciplined annually by school.
2. All "EEO-5" reports filed by the School District with the Office of Civil Rights and/or the Equal Employment Opportunities Commission.
3. Any and all statements, pamphlets, memoranda, and/or other communications prepared and/or issued by U.S.D. 501 to students, parents, teachers, and/or administrative personnel relative to policies, practices, and procedures of the School District concerning the rights, responsibilities or discipline of students.
4. All correspondence between the School District, and HUD or any of its predecessor agencies, including the Public Housing Administration.
5. All correspondence between the School District and the Topeka Housing Authority.
6. All correspondence between the School District and the U. S. Department of Education or its predecessors, relating to compliance with federal civil rights laws and/or requests for federal funds for desegregation related purposes.

7. All correspondence with the Kansas Commission on Civil Rights, the Topeka Human Relations Commission, the Equal Employment Opportunities Commission, the U. S. Department of Justice or the Kansas Attorney General's Office, relating to desegregation, segregation, student transfers, student discipline, teacher/administration hiring, firing, assignment or transfer, or allegations of civil rights violations.

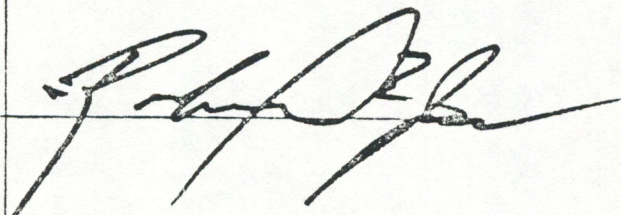
8. All senior high school yearbooks from 1940 to the present.



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Topeka, Kansas 66603  
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CERTIFICATE OF SERVICE

Richard E. Jones, the undersigned counsel, hereby certifies that he placed a copy of the above and foregoing Request for Production of Documents in the United States mail, first class postage prepaid, correctly addressed to Gary Sebelius, Eidson, Lewis Porter & Haynes, 1300 Merchants Bank Tower, Topeka, Kansas 66612, on this 1st day of June, 1982.



Richard E. Jones