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Norman Dorsen
PRESIDENT

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EXECUTIVE DIRECTOR

November 14, 1983

E. Richard Larson
STAFF COUNSEL

Dr. Gordon Foster
7751 S.W. 131st Street
Miami, FL 33156

Re: Brown III

Dear Dr. Foster:

I previously mentioned that we had a deadline of August 1, 1983 within which to file answers to the school board's (what is our case?) interrogatories, a deadline informally extended to November 1, 1983; a deadline unmet; and a deadline now fortunately extended by the court to April 15, 1984. Despite the extension, I believe we nonetheless should begin our document analysis as soon as possible.

My understanding from Bill Lamson is that your expert witness role is primarily based upon the demographic work, statistical analyses, and maps prepared by Bill Lamson. If I'm wrong in this assumption, please let me know. As to the possibility of the latter, enclosed at this time are copies of the school board's first interrogatories to us, and of our tentative and partial statistical analysis of the racial identifiability of the Topeka schools based upon a 15% variance.

Despite -- or certainly in addition to the foregoing -- I have several requests for you.

1. Please send me your curriculum vitae. I need to turn it over to the school board's counsel. This certainly doesn't mean that defense counsel will want to take your deposition before sometime next summer; it simply means instead that defense counsel would like to do some preliminary library research on you.

2. I understand that you and Bill Lamson were hired as expert consultants by the Topeka school board sometime in the mid-1970s, and that you both prepared a plan which thereafter was placed on the back shelf and never implemented by the school board. Since the school board to date has declined to produce this plan for us in response to our discovery requests, I asked Bill if he could find a copy of that plan in his files. He couldn't. I'm now asking you the same question. If you can locate that plan (bill me of course for your search time), please send me a copy as soon as possible.

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3. Finally, it is my intent to find an expert witness for us who will prepare an inequality/quality study for us with regard to curriculum and facilities in Topeka, and who thereafter will testify for us. Norman Chachkin sometime ago suggested that we should contact Wilbur Brookover for these tasks. Is he okay? The best? Who is?

Thanks in advance for your response to these questions. I no doubt will be talking with you sometime soon.

Sincerely,

E. Richard Larson

ERL:ln
Enclosures
cc: Bill Lamson