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 NO. 6
OF THE SECOND SET

6. Were there any different attendance zone configurations for elementary, Junior High, or High Schools between 1951 and 1963, other than the ones you identified in answer to the First Set of Interrogatories?

ANSWER:

Not to our knowledge. Upon rechecking the District records housed in its Office of Demographic Services, those of the State Department of Education and the former Shawnee County Superintendent of Schools files, no attendance zone configurations for elementary, junior high or senior high schools for the period 1951 to 1963 have been identified other than those previously provided. The review of the attendance zone configurations was conducted by Gerald A. Miller, Director of Demographic Services for Unified School District No. 501.

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 of Demographic Services for Unified School District No. 501, that he has read the answer to Interrogatory No. 6 of Intervening Plaintiffs' Interrogatories--Second 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.

Deraid a. Miller

Subscribed and sworn to before me this 20th day of March, 1982.

my appointment expires: - Luis 26, 1985.

MARY BELLE TILLEY State Notary Public Shawnee County, Kansas My Appointment Expires -26 1985

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct The undersigned hereby certifies that a title and control copy of the above and foregoing ANSWER OF UNIFIED SCHOOL DISTRICT NO. 501 TO PLAINTIFF-INTERVENORS' INTERROGATORY NO. 6 OF THE SECOND SET was served by hand delivering the same this SOLA day SECOND SET was served by hand delivering the same this 301 day of March, 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.

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Attorneys for Unified School District No. 501