

1/5/81

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. 4

4. Describe the geographic boundaries of your school district as presently constituted.

ANSWER:

The present geographic boundaries of Unified School District No. 501, Shawnee County, Kansas, are as follows:

Beginning at the SE corner of the W 1/2 of section 34-T11S-R16E; thence south 1 mile, west 1/2 mile to the SW corner of sec. 3-12-16; thence south to the northerly right-of-way of the Kansas Turnpike, follow said right-of-way southwesterly to its intersection with the east line of the W 1/2 of the W 1/2 of sec. 16-12-16; thence south to a point 1,650 feet south of the north line of sec. 21-12-16; thence west 1,320 feet, north approximately 330 feet to the SE corner of the NE 1/4 of the NE 1/4 of sec. 20-12-16; thence west to the southerly right-of-way line of the Kansas Turnpike, follow said right-of-way line in a general southwesterly direction to the east right-of-way line of Adams Street; thence north to a point approximately 1,320 feet south of the north line of sec. 20-12-18; thence west approximately 1,315 feet to a point on the east line of Lot 2, Block G of Southern Hills Subdivision "B" (the same being the east line of the W 1/2 of the E 1/2 of sec. 19-12-18); thence south to the north right-of-way line of the Kansas Turnpike, follow

said right-of-way line to the west right-of-way line of US 75 Highway, north along said west line to the south line of the NE 1/4 of sec. 24-12-15; thence west to the center of said sec. 24, north to the south line of the N 1/2 of the N 1/2 of said sec. 24, west to the SE corner of the NW 1/4 of the NW 1/4 of said sec. 24, north to the northerly right-of-way line of I 470 By-Pass; thence follow said right-of-way line north-westerly to a point 82.5 feet east of the west line of sec. 24-12-15; thence continue northwesterly along said right-of-way line 840 feet, northerly 148.5 feet, east 270.8 feet, south 30 feet, east 301.53 feet, north 200 feet, east 108.97 feet, north 160 feet to the north line of sec. 23-12-15; thence west to the NE corner of the NW 1/4 of said sec. 23, south 260 feet to the SE corner of Heinsohn Subdivision "A", west 1297.9 feet, south 240 feet, west 262 feet to the east line of Greensboro Subdivision, south approximately 1314.12 feet to the SE corner of said Subdivision, west 1094.71 feet to the SW corner of said Subdivision, north to the NW corner of sec. 23-12-15; thence west to the SW corner of the SE 1/4 of sec. 16-12-15; thence north to the NW corner of the NE 1/4 of said sec. 16 (the same being on the south right-of-way line of 29th Street); thence follow the south right-of-way line of west 29th Street to a point 25 feet south and 60 feet east of the SW corner of sec. 9-12-15; thence north 2671.10 feet, east 2587.05 feet to the center of sec. 9-12-15; thence north to the north line of said sec. 9, west to the SW corner of the E 1/2 of the E 1/2 of the W 1/2 of sec. 4-12-15; thence north to the easterly right-of-way line of I-470, follow said right-of-way line northerly to the point where it intersects the north right-of-way line of west 17th Street; thence east along said 17th street right-of-way to the west line of the E 1/2 of the E 1/2 of the W 1/2 of sec. 4-12-15, thence north to a point 2014 feet west of the NE corner of the W 1/2 of the SE 1/4 of sec. 33-11-15; thence east to the center of said sec. 33, north to the NW corner of the NE 1/4 of said sec. 33, east to the NE corner of said sec. 33, north to a point 3853.47 feet north of the SW corner of sec. 27-11-15; (the same being the NW corner of West Hills Subdivision #2); thence northeasterly along a line described as follows: Beginning at a point 661.2 feet north of the south line of the NW 1/4 of sec. 20-11-16 and 433.21 feet west of the westerly right-of-way line of U.S. Highway 75 and terminating at a point which is 3853.47 feet north of the SW corner of sec. 27-11-15; thence northeasterly across the Kansas River to the point where the west line of Kaw Reserve #1 intersects the north bank of said River; thence easterly along said north bank to the SW corner of Railroad Street Addition, north to the SW corner of Hentig Addition, northerly along the west line of Hentig Addition and the west line of North Park Addition to the north line of the lower Silver Lake Road (north 4th Street); thence east along said north line to the SW corner of Lot 4, Block 14, North Park Addition, Kaw Reserve #2; thence north to the NW corner of said North Park Addition, east to the NE corner of said North Park Addition, south to the north bank of the Kansas River; thence southeasterly along said north bank to the point where it intersects the west line of Philbin's Subdivision extended south; thence north to a point 50 feet north of the center of the main track of the Union Pacific Railway; thence southeasterly and parallel with said Railway to the west line of the

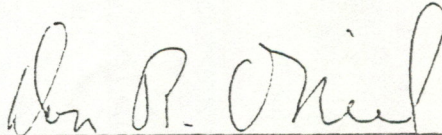
E 1/2 of Kaw Reserve #3, north to the north line of Gordon Avenue; thence southeasterly along said north line to the west line of Morris Addition, north to the NW corner of Morris Addition; thence southeasterly along the north line of said Addition to the NE corner thereof, south to the north line of Grant Street, east to the west line of Western Avenue, north to the north line of St. John Street; thence east to the east line of Kaw Reserve #3, north to the north line of Lefler's Addition; thence east along the north line of said Addition to the west line of North Tyler Street, north to a point where said west line meets an extension of the north line of Rambo's Addition; thence east to a point 205 feet west of the west line of Harrison Street, north 380.5 feet, east to the west line of U.S. Highway 75 and its junction with the center line of Soldier Creek; thence north along the west line of said highway to the SE corner of the North Topeka Trailer Court, west to the SW corner of said Trailer Court, north to the center line of Broad Street, east along said center line to the east right-of-way line of U.S. Highway 75; thence southwesterly along said east right-of-way to its intersection with the old channel of Soldier Creek; northerly along said channel to its intersection with the east line of Garfield Park; thence southeasterly along said east line to the center line of Soldier Street (said point being 1173 feet easterly from the center of Kansas Avenue and 570.4 feet westerly from the east line of Kaw Reserve #4); thence east 570.4 feet, south to the SE corner of Addition "A" to Garden Place; thence west to the prolongation northerly of a line 420' easterly of and parallel with the center line of Jefferson Street; thence southerly to the north bank of the Kansas River, northeasterly along said north bank to a point due north from the NE corner of Earnest's Addition; thence south to the NE corner of Bradford Miller's Addition (said point being on the center line of Chase Avenue); thence northeasterly along the center line of Chase Avenue to a point which is 33.1 chains north and 4.5 chains west of the SE corner of sec. 29-11-16; thence south to the south line of Chase Avenue, northeasterly along said south line to the east line of sec. 29-11-16; thence north to the north line of Sardou's Second Addition, northeasterly along the east and south bank of the Kansas River to the point where the east line of the Oakland Addition extended north meets the south bank of said river; thence south to a point which is approximately 1320 feet north of the SW corner of sec. 22-11-16; thence east approximately 2659 feet to the NE corner of the S 1/2 of the SW 1/4 of sec. 22-11-16; thence south to the SE corner of the SW 1/4 of said sec. 22, east to the NE corner of sec. 27-11-16; thence south to the SW corner of the NW 1/4 of sec. 26-11-16; thence east 35 rods to the east bank of the old channel of the Shunganunga Creek; thence follow said bank northeasterly 35 rods; thence northwesterly at right angles to the east bank to the center line of said creek; thence follow said center line in an easterly direction to its point of intersection with the north line of the S 1/2 of the SW 1/4 of sec. 26-11-16; thence west to a point 1329.06 feet north of the SW corner of said sec. 26, west 726 feet, south 664.53 feet, west 200 feet, southwesterly approximately 640 feet to a point approximately 332 feet north of the south line of sec. 27-11-16; thence west approximately 740 feet; thence south to the north line of sec. 34-11-16; thence west 464.21 feet to the center line of Rice Avenue; thence south to the point of beginning.

VERIFICATION

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

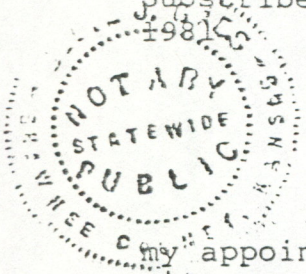
That he is Associate Superintendent, Management Services, for Unified School District No. 501, that he has read the answer to Interrogatory No. 4 of Intervening Plaintiffs' Interrogatories --First Set which was prepared under his general direction and supervision and such answer is true and correct to the best of his knowledge and belief.

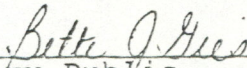
Further Affiant saith not.



DON R. O'NEIL

Subscribed and sworn to before me, this 5th day of January,





Notary Public

my appointment expires:
May 3, 1983.

CERTIFICATE OF SERVICE

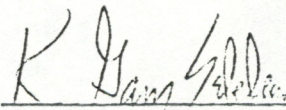
The undersigned hereby certifies that a true and correct copy of the above and foregoing ANSWER OF UNIFIED SCHOOL DISTRICT NO. 501 TO PLAINTIFF-INTERVENORS' INTERROGATORY NO. 4 was served by depositing same in the United States mail, first class postage prepaid, this 5th day of January, 1981, addressed to:

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