

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. | ) |           |
|                                    |             | ) |           |

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ANSWER OF UNIFIED SCHOOL DISTRICT NO. 501  
TO PLAINTIFF-INTERVENORS' INTERROGATORY NO. 29

29. Please state the total number of applicants by race or national origin who applied to the District for positions as classroom teachers for the last ten (10) academic years.

ANSWER:

The number of applicants who have applied for positions as classroom teachers over the past ten academic years is as follows:

| <u>Year</u> | <u>Number of Applicants</u> |
|-------------|-----------------------------|
| 1979-80     | 1590                        |
| 1978-79     | 1610                        |
| 1977-78     | 1617                        |
| 1976-77     | 1740                        |
| 1975-76     | 1742                        |
| 1974-75     | 1649                        |
| 1973-74     | 1824                        |
| 1972-73     | 2293                        |
| 1971-72     | no record of number         |
| 1970-71     | no record of number         |

The School District does not maintain records with regard to the race or national origin of applicants.



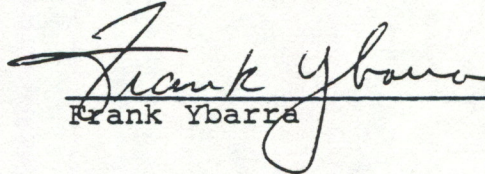
The answer to this Interrogatory was prepared under the direction and supervision of Frank Ybarra, General Director of Personnel for Unified School District No. 501.

V E R I F I C A T I O N

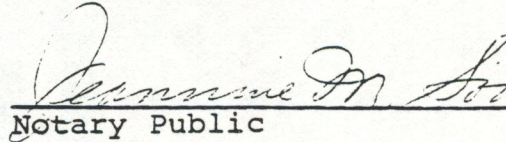
The undersigned, of lawful age, being first duly sworn upon his oath, deposes and states:

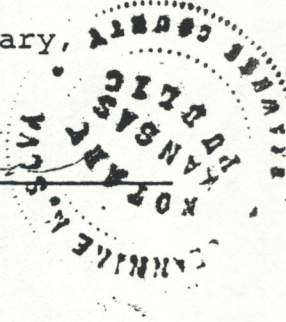
That he is General Director of Personnel for Unified School District No. 501, that he has read the answer to Interrogatory No. 29 of Intervening Plaintiffs' Interrogatories --First Set which was prepared under his general direction and supervision and such answer is true and correct to the best of his knowledge and belief.

Further Affiant saith not.

  
Frank Ybarra

Subscribed and sworn to before me, this 16<sup>th</sup> day of January, 1981.

  
Notary Public

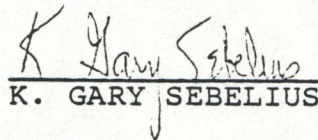


my appointment expires:

My Appointment Expires Dec. 27, 1984

C E R T I F I C A T E O F S E R V I C E

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. 29 was served by depositing same in the United States mail, first class postage prepaid, this 17<sup>th</sup> day of January, 1981, to attorneys for Intervening Plaintiffs by serving Richard Jones, Scott, Scott, Scott & Scott, 724 1/2 Kansas Avenue, Topeka, Kansas 66603.

  
K. GARY SEBELIUS