IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF GEORGIA

SAVANNAH DIVISION

RALPH STELI, et al.,
Plaintiffs, UNITED STATES OF AMERICA

Plaintiff-Intervenor
CIVIL ACTION NO. 1316
v.

SAVANNAH-CHATHAM COUNTY BOARD OF EDUCATION, et al., Defendants.

BRIEF IN SUPPORT OF PLAINTIFF-INTERVENOR'S PROPOSED FINDINGS OF FACT, CONCLUSIONS OF LAW AND DECREE

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IN THE UNITED STATES DISTRICT COURT FOR THE

## SOUTHERN DISTRICT OF GEORGIA

SAVANNAH DIVISION


CIVIL ACTION NO. 1316

BRIEF IN SUPPORT OF PLAINTIFF-INTERVENOR'S
PROPOSFD FINDIINGS OF FACT, CONCLUSIONS OF LAW AND DECREE
I.

NATURE OF THE ACTION

This action was commenced on January 18, 1962. The complaint sought a Decree enjoining the defendants from:

1. Operating a compulsory biracial school system;
2. Continuing to maintain a dual scheme or pattern of school zone lines or attendance area lines based on race or color;
3. Assigning pupils to schools in Chatham Comty on the basis of race and color of the pupils;
4. Assigning teachers, principals and other professional school personnel on the basis of race and color;
5. Approving budgets, making available funds, approving employment and construction contracts, and approving policies, curricula and prograns designed $1: 0$ perpetuate or maintain or suprort racially segregated schools.

In an opinion and judgment dated June 28, 1963, the Court found "the primary and secondary public schools of SavannanChatham County are divided into schools for white pupils and schools for negro pupils and the admission thereto is limited to applicants of the respective races." The Court also fond "the teachers and administrative staff of the white and negro schools are white and negro respectively, up to and including the direct assistants to the superintendent of schools." The Count also found that Negro students in the Savannah-Chatham County school system scored lower than white students or a standardized test and concluded that the racial classification of students in this system was a reasonable oile.

Following further proceedings in the District Court ard Conct of Appeals, on August 24, 1965 the District Court disapproved and disallowed the school board's proposed desergre.. gation plan and ordered the board to subait a new plan which would take into account ase and mental qualificetions of
school children and which would provide for the termination of "discrimination in favor of Negro teachers and against white teachers." The defendant school board then moved for a new trial and amended judgment, and on September 1,1965 the Court ordered the plaintiff to show cause on November 3, 1965 why the board's motion should not be granted.

At the November 3, 1965 hearing, the defendants presented to the Court an amended plan and the Court gxanted the plaintiffs time to file objections to the amended plan.

The Court granted the United States leave to intervene on Noveniber 15, 1965. On December 28, 1965 the Court heard the objections to the piaintiffs and of the United states to the amended plan. At that ine the paries agreed that the following are the questions for determination in this proceeding:

1. The admissibility, particularly with reference to Rule 26 , of the depositions taken in Savannah, Georgia on December 22, 1965 upon notice by the Goveranent and the Exhibits referred to therein, and if such depositions are adnitted then the questions as to relcvancy and materiality thereof;
2. All Motions pending in the above stated case, including the motion filed by Plaintiff to Dismiss the Defendants Intervenor as parties, if such motion is still penring;
3. The approval of a plan for desegregation.

It was agreed that briefs were to be filed and served by Jamiary 20,1966 and reply briefs by January $31,1966$.

## II.

THE PARTIES
The plaintiffs are 35 Negro school children attendirg Chatham County schools, suing by their next friends, on their own behalf and on behalf of all others similarly situated.

The defendants are the Board of Public Education for the City of Savannah and County of Chatham, its members and officers, and the Superintendent of Schools of Chatham County.

On April 3, 1963 the Court granted leave to intervene as defendants to ten white school-children attending Chathan County schools, by their next friends, and to their parents, intervening on theix own behalf and on behalf of "those white children or parents of white children who desire not to be forcibly compelled to associate with plaintiffs and others of their ethnic group in the common schools of Savannah-Chathan County."

The motion of the Unjed States for leave to intervene under 42 U.S.C. §2000h-2 ( $\$ 902$ of the Civi.i Rights Act of 1964) was granted on November 15, 1965.
III.

## SAVANNAH CHATHAM COUNEY SCHOOL. DLSTRICR

The Savannah.-Chatham County school district is comtermi.nows with the county, which has an area of 441 square miles. The total population of the county is $188,0!6$ of which 125,115 are white persons and 63,930 are Negroes d/

According to the defendant school board's forecast, ad justed through June $29,1.965$ (Ex. 37), the following conditions were expected for the $1965-66$ school year:
No. at Regular

Schools Classrooms Garacity | Enrollment |
| :---: |
| Forecast |

White

| EJementary | 24 | 435 | 14,139 | 14,622 |
| :---: | :---: | :---: | :---: | :---: |
| Secondary | -10 | $-\frac{399}{834}$ | $-11,874$ | $-\frac{11,807}{26,013}$ |
| Total | 34 | -429 |  |  |

Negro

| Elementary | 19 | 312 | 10, 1.12 | 9,703 |
| :---: | :---: | :---: | :---: | :---: |
| Secondary | 7 | 21.1 | 6,192 | 6,1:10 |
| Total | 25 | 523 | 16,304 | 16,1].8 |
| Grand Total | 50 | 1.357 | 52, 31.7 | 42,45)7 |

The school board operates 67 school buses (Dep. Smith, p.20) which caxry approximately 11,600 pupils each day.

As of October 20, 1965, there were 292 Negroes attending schoois with white students wider the transfer provisions of the desegregation plan (Ex. 39).

[^0]The Savannah-Chatham County School District is divided into small geographic units called Enumeration Districts. $2 /$ (Dep. Bargeron, p.5) Each year, commencing in Jaruary, the Board conducts a student census in order to forecast the next year's enrollment by Enumeration District. (Dep. Bargeron, pp. 3,4,5; Es. 15) The data gathered in this census is kept separate according to the racial character of the reporting schools. (Dep. Bargeron, pp. 5,6,19; Exs. 20,21)

Two forecasts are made of the number of students from each Enumeration District anticipated to attend each grade the following year. (Dep. Bargeron; Exs. 24,25) One forccast is based upon the data reported from schools attended by Negroes (ix. 25), and the other is based uron the data reported from schools attended by white students. (Ex. 24)

These forecasts provide the basis for establishing the next year's school districts for each set of schools. Each Enumeration District is assigned to two schools at each grade level - a school for white students and a school for Negro students. (Dep. Bargeron, pp. 30,31; Exs. 27,28) This is best portrayed by the following excerpts of documents published by the defendant Board in April 1965:

2/ Enumeration Districts (ED) are sub-divisions of Census Tracts (CN). These geographical units were devised by the U. S. Bureau of the Census.

| $\begin{aligned} & \mathrm{CT} \\ & \text { or } \\ & \mathrm{CC} \\ & \hline \end{aligned}$ | ED | $\frac{\text { GRADES }}{1-6}$ | 7 | 8-9 | 10-11-12 | Exception |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| 1 | IN | Massie | Chathan | Chatham | Groves |  |
|  | 1 P | Massie | Chatham | Chatham | Groves |  |
|  | 2 | Massie | Chatham | Chatham | Groves |  |
| 2 | 3N | Massie | Chatham | Chatham | Groves |  |
|  | 3P | Massie | Chatham | Chatham | Groves |  |
|  | 3R | Massie | Chatham | Chatham | Groves |  |
|  | 4 N | Massie | Chatham | Chatham | Groves |  |

EXHIBIT NO. 28

| $\begin{aligned} & C T \\ & \text { or } \\ & C C \\ & \hline \end{aligned}$ | ED | $\frac{\text { GRADES }}{1.6}$ | 7 | 8 | 9 | 10-11-12 |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| 1. | 1 N | $\begin{aligned} & \text { Barnard }(1-4) \\ & \text { Butler }(5-6) \end{aligned}$ | Cuyler | Cuyler | Cuyler | Beach Sr. |
|  | 1 P | Barnard (1-4) | Cuyler | Guyler | Cuyler | Beach Sr. |
|  | 2 | $\begin{aligned} & \text { Barnard }(1-4) \\ & \text { Butler }(5-6) \end{aligned}$ | Guyler | Cuylex | Guyler | Beach Sr. |
| 2 | 3N | Barnard (1-4) <br> Butler (5-6) | auyler | Cuyler | Cuyler | Beach Sr. |
|  | $3 P$ | Barnard (1-4) <br> Butler (5-6) | Cuyler | Cuyler | Cuyler | Beach Sr. |
|  | 3R | Barnard (1-4) <br> Butler (5-6) | Cuyler | Cuyler | Cuyler | Beach Sr. |
|  | 4 N | $\begin{aligned} & \text { Barnard }(1-4) \\ & \text { Butler }(5-6) \end{aligned}$ | Gryler | Cuyler | Guyler | Beach Sr. |

Massie, Chatham, and Groves are schools for white students (Ex. 20), while Barnard, Butler, Cuyler and Beach are schools for Negroes (Ex. 21). The Board also published street descriptions of the school districts. 3/

3/ There are two different kinds of areas in relation to schoole in Savannah and Chathan County. The first, the area described for each school in teras of boundaries in Exhibits 3 and 4 , shall be referred to in this brief as "school district." The areas described on the back of Exhibit 38, each of which contain several schools, shall be referred to herein as "atiend. ance areas."

When a ners student seeks to enroll in school, the principal refers to the street description (Ex. 3,4), or to a map based thereon, in determining whether to enroll him. If the puril does not reside in the school's district, the principal refers him to another school of the same racial. character as his school. (Deps. Edwards, p. 1.63; Bryant, pi. 168,169,171-180)

For example, the principal of Shuman Junior Higl School (white) has referred students who reside jusi outside his school district to Chatham Junior IIgh School (white), (Dep. Edwards, p. 163) althouch Hubert Junior High School (Negro) is located between Shuman and Shatham. $4 /$

Although the defendant Board ordinarily assigns stum dents geographically, by race, exceptjors are made in certain cases. These exceptions fall into Eour categories:

1. Special Circumstance Transfers

Students are permitter to transfer from the school to which they are assignel to arother school, where compliance Witk the assignment would vork a hardship. (Dep. Bargeron, pp. 3I, 32)
2. Special Education Assigmments

Student's who attend special classes, such as classes for the blind, which are not maintained at each school, are assigned to schools in which such classes are maintained rather than geographically. (Dep. Bargeron, pp. 36,37)

[^1]3. Transfers co Richand Arnold Vocational High school.

The Richard Axhold school served grades 7 through 9 for the 1964-r 1965 school year. In 1965 that school was converted into a vocational high school servirig grades 8 through 12. (Dep. Bargeron, pp. 32,33) Except for those students who had been attending Richard Arnold in previous years, any student desiring to attend that school is required to make application for transfer (Dep. Bergeron, p. 33; Ex. 31)

Except for Pichard Arnold applications, these transfers are administered by Mrs. Saxon $P$. Bargeron, Director of Gurriculum Levelopment and Pupil Services. (i)ep. Bargeron, F. 31) The transfers to Richard Arnold are administered by the schools involved. (Dep. Bargeron, p. 34) However, firal approval of Richard Amold transfers is made by Mrs. Bargeron.

Mrs. Bargeron testified that "... there are in thy office no cut-off dates on transfers. Any time a child's special needs indicate that he should be in another situation and he asks to go to another situation, he is permitted to go." (Dep. Bargeron, pp. 34, 35)
4. Desegregation Pian

Undex the desegregation plan students are permitted to make a choice of schools under limited circumstances. This plan will be fully discussed in Part IV, jnfra.
3. Transportation is Provided According To

Fupi 1 assignments
i. Frocechaves for Establishing Sus Rolites

On or about July let of each year the Director of Transportation receives a set of documents on which are described, in terms of streets and other landmarks, the boundaries of each school in the Savannah-Chatham school.
systom。 (Dep. Smith, p. 5; Exs. 3,4)
The school boundaries are studied in order to deter.. mine the changes to be made, if any, in the boundaries from the previous year, so that a corresponding adjustment in the previous year's bus routes can be made. In addition to the boundary descriptions, maps showing Census Traces and Emmeration Districts are referred to. (Dep. Sinith, p.9)

After schooi begins in the fall of each year, it becones necessary to make adjustments in the routes. These adjustnents are based on reports submitted by the prjnotpals of each school on which are listed the names and addresses of students in attendance at each school who are entithed to be transported. (Dep. Smith, PP. 11.12; Exs. 5,6,7) The adjusthents made consist of adding buses to routes for particular schools, makince adiftional trips on existing routes, changing pick up pointe or changing rontes to coincide with adjustments of school assigments due to overcrowirg. (Dep. Snith, ppe 12, 13,20 ) Such shifts in student assigments, requiring bus routes to be adjuated, are made kriown to the transportation division by employees of the Eoard reaponsible for assjgning pupils to schools. (Dep. Smith, p.13)

## 2. Restrictions on Transporiation

All children who resicie in Chatham County, as opposed to the City of Savannah, who live more than one and one-half miles from the school to which they are assigned are transported in Board of Education school buses. (Dep. Smith, p.6)

Students who reside within the city limits of Savannah and who are assigned to schools outside the city limits which are more than one and one-half miles from their residence are also transported by Eoard of Education school buses. (Dep. Smith, P.6)

Students who reside within the city limits of Savannah and who are assigned to schools within the city limits are not transported by county school buses. They rast make. arrangements to be transported by Savannah Transit buses even though they may reside more than one and one-kalf miles from the school to which they are assigned. (Dep. Smith, pp. 5,7)

Bus routes are established by school; i.e., students are picked up according to the school to which each bus is going. (Dap. Smith, p.7) Thus, if a student resides outside the school district whose boundaries are described in Exs. 3 and 4 , he will not be transported to that school. (Dep. Smith, p.8) The exception to this rule is where special education classes are located in only a few schools and have stulents in attendance who reside throughout the county and cjty. (Dep. Smith, P. ©)

A student who transfers to a school which is outside the boundaries of the scrool to which he has been assigned will not be provided with transportation because of rules established by the State Board of Education (Dep. Smith, p.20)
C. Faculty and Staff Personnel Are Hired and Assimed Accorcing to Their Race

1. Hiring and Placement of Teachers

Toward the end of each school year, the principal of each school js given a form to complete which reflects each principal's estimate or the anticipated need for teachers for the following school year. (Dep. Gray, pp.30,31; Exs. 9,10) These forms are to be returned to the personnel office by May lst of each year; however, their return by the 15th of April is encouraged. (Dep. Gray, P.31)

From the submitted forms, the office of personnel estimates the number of teachers by grade level and by subject matter that will be needed for the following school. year. (Dep. Gray, p.32)

Reference is then made to applications on file, known as the "ready reservoir," of prospective teachers who have been interviewed and found qualified. (Dep. Gray, p.32) Contracts are offered to a certain number of teachers by grade level specialty, on the elenentary school level, and by subject matter specjalty, on the secondary school level.。 (Dep. Gray, p.32, Ex. 12)

The applications for employment in the "ready reservoir" are filed in three groups -- an inactive group, a current applicants group, and a former employees group. There are two sets of files so subcivided ... one for white applicants for employnent and one for Negro applicants for employment. The folders in which the applicants: materials are filed have two different color tabs ... one color for white applicants and another color for Nesco applicants. (Dep. Gray, p.33)

Teaching positions in schools formerly referred to as "Negro" are always filled oy Negro teachers and teaching positions in schools fomerly referred to as "white" are always filled by white teachers. (Dep. Gray, p.35)

The Director of personnel has never been instructed to place a Negro teacher in a white school, foi regular classes, or a white teacher in a Negro school. In 1964, a Negro teacher applied for transfer to a white school to teach sociology. At the time of the application there was no vacancy but had there been a vacancy, the transfer would not have been approved without specific instructions from the Board. (Dep. Gray, pp. 35,36, and 37)
2. Substitute Teachers

The Director of Personnel is also responsible for supplyjng schools with substitute teachers.

An applicant for a subsijtute teacher position must complete an application form, different from the form coinpleted by applicants for full-time employment. (Dep. Gray, p.37) All applications are accepted because substitute teachers are not put under contract and are not required to be certified by the State Board of Education. (Dep. Giay, [.38)

The office of persomel keeps two lists of substitute teachers. One is a list of white substitute teachers; the other is a list of Negro substitute teachers. (Dep. Gray, pp. 37,38; Exs. 13,14)

The availability of substitute teachers is macle krom to each principal by the office of personnel by furnishinc a list of white substitute teachers to the principals of white schools and a list of Negro substitute teachers to the

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principals of Ne\xiro schools. (Dep. Gray, p.38)
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The Savannah-Chatham school system has itinerant teachers in physical education, art, and music. (Dep. Gray, p.41) These teachers are based at one school for administrative purposes, but teach their subjects in several schools. Negro itinerant teachers teach only in Negro schools and white itinerant teachers teach only in white schools. (Dep. Gray, P. 41, 42)

## V.

THE DESEGREGATION PIAN FAILS TO
ELIMTNATE THE DUAL, SCHOOL SYSTEM
A. The Deserregation Plan

On August 31,1964 , the defendants filed a resolution adopted on August 28, 1964, by the Board of Education which includes amendments to the desegregation plan of the Foard of ducation. pertinent to the procedure of the assignnent and transfer of Negro students since the date upon which the amendments were adopted are the following ameridments:
"l. In the assignnent, transfer, or continuance of pupils among and within the schools, or within the classroom and other facilitices thereof, the following factors, in addition io those wich are normally consideed in these respects, shall be considered with respect to the individual pupil, (1) choice of the prupil or his parentes or guardians, (2) availability of space and facilities fin and for the school. chosen, and (3) proximity of the school to the place of resilence of the pupil. In such conmedion, no consideration shall be given to the race of the pupil. Where space and facilities are not available for all, priority shall be based on proximity, except that for justifiable educational reasons and in hardship cases other factors not related to race may be applied. Administrative assignments or reassignments may be made in cases of overcrovding, in hardship cases, and for disciplinary reasons. When such administrative assignments are made they shall be based on relative proximity and available facilities, giving consideration to pupil chojee where possible."
"3. The Superintendent shall have authority to establish each school year attendance areas which shall be based upon all pertinent and relevant factors, except race nay not be considered, so that choice of schools and per and final registration may be made in a reasonable and orderly manner. All existing school assignments shall continue without change until or miless transfers are directed or approved by the Superin. tendent or his duly authorized representative."
14. Assirnments and transfers of pupils shall be made on forms which will. De available at the office of the Superintendent of Education, 208 IBull Street, Savannah, Georgia, and the choice of the pupil shal.l. be made at the preregistration or if the pupil does not prearegister, then at the final registration dates as determined by the Superintendent for all students."
"12. Student assi.gnnents and transfers shall be made in accordance with the aforesajd rules and regulations and without regard to race or color. The original Plan, which is amended hereby, provided for the desegregation for the School Year 1963-1964 of students in the 12 th Grade, and therenfter, in each successive year, to the immedjate lover grade, and the 12 th and 11 th grades, therefore, were desegregated under the origimal. Plan; such Plan is norv amended to include the loth and lst Grades for 1964-1965, the 9 th and 2nd Grades for 1965..1966, the 8th and 3rd Grades for 1966m1967, the 7 th and 4th Grades for 1967-1968, and the 6th and 5th Grades for 1968-1969."
"13a. Nothing herein contained shall be constmed to prevent the assignment of individual students to particular schools on a basis of intelligence, achievenent or other aptitudes upon a uniformy adrinistered program but race must not be a factor in making the assjgnments."

On June 9, 1965 , the defendants filed a further amendment which added to paragraph 12:
"Students new to the school. system shall also have the right to attend grades not yet reached by this desegregation Plan."

## B. The Adninistration of the Plan

The administration of the desegregation plan is the responsibility of Mr. Delmas H. Kni.ght, Assistant Superintendent for Instrucion. (Dep. Knight, p. 138)

Under the plan, students are divided into two categories:

1. Students in the School System

Those Negro students who were enrolled in schools in the Savannah-.Chathan County school system and who desired to at-dend schools other than the ones to which they were assigned,
were reguired to make application for tránsfer on a prescribed form. (Dep. Knight, pp. 139,140; Ex. 38)

Applications were approved if three requirements were met. These requirements were (1) that the application be subaj.tted not later than Kay 17,1965 , (2) that the applicant request a transfer to a grade covered by the plan for desegregation; viz., the lst, 3rd, 9 th, 10 th, llth, or 12 th grades, and (3) that the applicant reside within the desegregation area, outlined on the back of Exhibit 38, in which the school to which he seeks transfer is located. (Dep. Knight, p.139)

This transfer systen has been in effect since 1963. There are approximately 42,000 studencs in the school systera. As of October 20 , 1.955, there were 292 Negro students transferred to schools formerly referred to as "white。" (Ex. 39)

> 2. First-Graders and Students New to the Savannah-Chatham School System

The plan for desegregation under which the Board of Education is presently operating, provides that Eirst graders and students new to the school system in any grade may choose the school they wish to attend within their desegregation attendance area. The practices of the Board and its agents, hovever, do not conform to this provision of the plan.

Mr. T. H. Edvards, Jr., principal of the Shunan Junior High School (white), testified that when a new white student, who does not reside within the Shuran school district, as described by Exhibit 4, appears at Mr. Edward's school to register, the student is referred to the white school within whose boundaries the student resides. He cited as an example, an instance in which new white students sought to enroll at

Shuman but resided within the boundaries describing the Chatham Junior High School district. The students, were referred to Chathan Junior High School, (Dep. Edwards, p.163), although Shuman and Chatham are in the same desegregation attendance area, and the back of Exhibit 38 says that persons residing in that area can choose any of those schools.

Similarly, Mr. Raleigh Bryant, Jro, principal of the Hubert Elementary and Junior High School (Negro), testified that when new students appear to register, who do not reside within the boundaries of the Hubert school, he refers them to the Negro school within whose district they reside -usually Johnson or Cuyler. Mr. Bryant testified further that "I haven't gone out of my way to inform them..." of the right to choose from several schools in the attendance area. (Dep. Bryant, pp. 168,169,171-180)

When a student completes finior high school, his permanent record card is antomatically forwarded, by the Junior High School principal, to the high school (of the same race) serving the Enumeration District in which he lives. (Dep. Edwards, pp. 164,165 ) No transfer foxim (Ex. 38) is used. For example, a principal of a white school preuregisters his graduating students in the tenth grade by using "... a form that we get from the schools they're going to. We ask their principal to come over and talk with our students, and then he brings the forms. And whatever he leaves, we'll use." (Dep. Edvards, po 165)
C. The School Board Fails to Provide Adequate Information About the Available Choices

1. Right to Make a Choice is Not Made Clear.

As has already been pointed out, school principals do not offer a choice form to each student eligible under the Plan and do not explain to such students their right to select a school.
2. Boundaries of Attendance Areas Not Made Clear.

At the time the choice is exercised, the applicant is provided with the choice form which has a description of the attendance areas, but does not have a map. The eiementary attendance areas are described by street boundaries, but the secondary attendance areas are not.

For example, secondary attendance area 3 is described as "that general. area now being served by Jenkins and Johnson."

This does not mean that attendance area 3 is cotemanous with the district boundaries of Johnson and Jenkins High Schools.

To illustrate, there are 16 Negro high school stucents residing in Enumeration District 52 N who are assigned to Johnson High School. However, this Enumeration Distrjet is in arca 2. There are numerous examples of this, see Exs. 27 and 28 which are reproduced in their entirety as Appendices $C$ and $D$; and see Appendix E .

The school board's failure to make attendance area boundaries clear is pronounced in the case where an applicant about to make a choice finds that he can choose neither the white school nor the Negro school to which pupils in his neighbonhood are assigned.

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For example, there are 8 Negro elementary students and 6 white elementary students residing in Enumeration District No. 17NA. Under the plan proposed by the defendants, the 8 Negro students would be automatically assigned to Haven Ele. mentary school and the 6 white students to Jacob Smith Elementary School. But the defendants would have the court believe that through the "free choice" option which they have inclucled in their plan, the racial character of this jnitial assignment can not be removed at the option of the student. This option, however, is illusory. Enumeration District No. 17NA falls within elementary attendance area 4, the supposed "iree choice" area. Haven and Jacob Smjth ilementary Schools, however, do not fall within this free choice area, but rather fall within elementary attendance area 2. Accordingly, these particular Negro and white elementary students are denied the option of attendirg either of these two schools. Iney must: either accept the one of these two schools to which they are initially assigned upon the basjs of their race or they must forego attendance at either of these schools.

Another example can be found with junior high school students in Enumeration District Nos. 38 A and 38B. There are 23 white students and 21 Negro students who Iive in this Enumeration District and attend junior high school. The white students are assigned to Chatham Junior High Sichool and the Negro students are assigned to Guyler High School. Both Chatham and Cuyler are in seconclary attendance area 2 . But the Enumeration District that these students reside in are located ir
secondary attendance area l. Ihus, these students cannot exercise a chojce between these two junior high schools but must accept the one to which they are assigned by reason of their race, if they are to attend either.
3. Unexpected Lack of Transportation.

One of the ramifications involved in transferring from the school to which one is assigned to another school is the possible loss of transportation rights.

The facts that some students will not be transported to school in public school buses if they transfer, is not made known to those students before they transfer.

Thirty-five Negro students whose applications for transfer had been approved, withdrew from the white school they were attending or about to atterd. Ten of those students gave as a reason for wanting to withdraw, the fact that transportation would not be provided. (See Appendix F)

The failure of the Board of Education to inform students of an important fact, such as lack of transportation, adds to the confusion, described above, that students must labor under to determine what their rights are and what it may mean to each student to exercise those rights.

Following are tables which reflect instances in which Negro studenis would not be transported to white schools they can choose to attend, while white students, resicing in the same Enumeration Districts, are assigned and transported to different white schools which those Negroes cannot choose to attend. Negro students residing in the Enumeration Districts shown on these tables will be unaware of the fact that transportation will not be available.

## TRANSPORTATION

## Elementary



[^2]```
Elementary (Continued)
```

White Schools Negroes Can Choose


## *Enumeration Districts

## TRANSPORTATTON

| Junior High |  |  |  |  |  | White Schools Negroes Can Choose |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| $\underline{E D *}$ | Deseg. Attendance Area | White Students Assigned $\qquad$ To | Buses Provided | Negro Students Assigned $\qquad$ | Buses provided | $\begin{aligned} & \text { Mercer } \\ & \text { Buses } \\ & \text { Provided } \end{aligned}$ |  |
| 38A | 1 | Chatham | Yes | Cuyler | No | No |  |
| 383 | 1 | Chatham | Yes | Cuyler | No | No |  |
| 41B | 1 | Chatham | Yes | Cuyler | No | No |  |
| 41 C | 1 | Chatham | Yes | Cuyler | No | No |  |
| 17NA | 1 | Chatham | Yes | Scott | No | No |  |
| 17RB | 1 | Chatham | Yes | $s \cot t$ | No | No |  |
|  |  |  |  |  |  | $\begin{gathered} \text { Myers } \\ \text { Buses } \\ \text { Provided } \end{gathered}$ | $\begin{aligned} & \frac{\text { Bartlett }}{\text { Buses }} \\ & \text { Provided } \end{aligned}$ |
| 30 | 3 | Savannah | Yes | Johnson | Yes | Yes | No |
| 32 | 3 | Savannah | Yes | Johnson | Yes | No | No |
| 33 | 3 | Savannah | Yes | Johnson | Unknown | Yes | No |
| 4 R | 3 | Wilder | Yes | Johnson | Yes | No | No |
| 6 N | 3 | Wilder | Yes | Johnson | No | No | No |

High School

| $E D^{*}$ | Deseg. Attendance $\qquad$ | White Students Assigned To | Buses <br> Provided | Negro Students Assigned $\qquad$ To | Buses Provided | White Schools Negroes Can Choose $\begin{aligned} & \frac{\text { Savannah }}{\text { Buses }} \\ & \text { Pravided } \end{aligned}$ |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| 5 | 2 | Groves | Yes | Beach | No | No |
|  | . |  |  |  |  | $\begin{aligned} & \frac{\text { Jenkins }}{\text { Buses }} \\ & \text { Provided } \end{aligned}$ |
| 30 | 3 | Savannah | Yes | Johnson | Yes | No |
| 32 | 3 | Savannah | Yes | Johnson | Yes | No |

*Enumeration Districts
D. Students Are Not Given an Effective Choice

1. The Racial Character of Schools is Retained.

Although provision is made under the desegregation plan for Negro students to attend school with white students, the schools have retained their racial character. The schools are no longer officially referred to as "white" schools and "Negro" schools, (Dep. p. 15), but the racial character of each school is easily identifiable from the race of the faculty and staff, (Dep. Gray, pp. 33, 35-37), fron the race of the students who are assigned in the usual course to attend there, (Exs. 20, 21), from the racial character of the schools from which it receives and to which it sends students, (Exs. 27, 28), and from the records of the defendant school board. (Exs. 1, 2, 5, 6, 7, $13,14,20,21,23,24,25,27,28)$
2. Negro Students Are Not Always Eermitted To Attend the Same Schools as White Students Who Resicie in Their Neighbor hod

The fact that the boundary lines of the free choice attendance areas are superimposed on, but are not related to, the boundary lines of the districts for each school, operates to discriminate against Negro stucents attempting to exercise their rights under the desegregation plan.

The table which follows this page shows instances in which Negro students, if they exercised a choice, would be barred from choosing the same white school to which white students who reside nearby are assigned as a matter of course.

## Elementary

| Desegregation Attendance Areas | Number of Enumeration Districts where white students are assigned outside Desegregation Attendance Areas | Number of White Students | Number of Negro Students who cannot choose the school attended by the White Students in their Emuneration District |
| :---: | :---: | :---: | :---: |
| \# 1 | 13 | 363 | 843 |
| \#2 | 1 | 46 | 15 |
| \#3 | 4 | 291 | 0 |
| \# 4 | 2 | 30 | 8 |
| \#5 | 0 | 0 | 0 |
| TOTALS | - 44 <br> 20 | 730 | 866 |

## SUTIARY OF DESEGREGATION ATTENDANCE ARFAS (white)

## Junior High

Deserreration Attendance Areas
\#1
\#2
\#3

Number of Enumeration Districts where white students are assigned outside Desegreğation Attendance Areas

20
5
$\frac{28}{28} 5$

Number of Negro Students who cannot choose the school attended by the White Students in their Enumeration District


Senior High

Deserregation Attendance Areas

| $\# 1$ | 0 |
| :---: | :---: |
| $\# 2$ | 15 |
| $\# 3$ | 11 |
| TOTALS | 26 |
| GRAND MOTAL | 99 |

Number of Negro Students who camot choose the
school attended by the
White Stucents in their
Enumeration District

0
$220 \quad 175$
407

633
2,381

To illustrate, the application of Bobbie Jean Walker, Appendix $B$, shows that students residing where Miss Walker does, in free choice attendance area 3, cannot choose to attend Savannah High School, located in attendance area 2; al though, as noted on Hiss Walker's application, they reside in the Savannah High assignment district.

## 3. Discriminatory Transportation System

The assjgnment of white students to schools outside their attendance areas as described above causes a discriminatory transportation system.

For example, a Negro high school student residing in Enumeration District 30, the Savannah Beach area, is assigned and transported to Johnson High School (Appendix D; Exs 28, 7). If that student desired to transfer from Johnson to Jenkins High School under the plan for desegregation, 5/ he can do so only by forfeiting his right to be transported (Dep. Smith, p. 28). 6 White students residing in the same Enumeration District are assigned and transported to Savannah High School (Appendjx C; Exs. 27, 6).

Reference to the tables starting on page 22 , surpa, will disclose numerous other examples of discriminatory bus routes.

[^3]> THEPE ARE NO ADMTNISTRATIVE BURDENS THAT WOULD JUSTTFY DEZAY IN DESEGREGATING THE SAVANNAH CHATHAM SCHOOL SYSTEM.

This court must decide whether there are any adrainistrative burdens which would justify any further delay of the institution of a system by the defendants whereby students in Savannah-Chathan County would be assigned without regard to race.

The Court of Appeals has held in this case that:
'Desegregation . . . being the order of the day, the only question left in the usual case, and this includes these cases, concerns the manter in which it is to be accomplished, and the time allowed for that purpose." Stell v. Savannah-. Chathan County Bd. of Ed. 333 F . 2 d 55 at 62 (5th Cir., 191,4)

The Suprene Court, in the second Brown decision, in holding that time for delay may be necessary said:
". . . such time [delay] is necessary in the public interest and is consistent with good faith compliance at the earliest practicable date. To that end, the courts may consider problems related to administration, arisjng from the physical condition of the school plant, the school transportation system, personnel, revision of school districts and attendance areas into compact units to achieve a system of determining admission to the public schools on a nonracial. basis, . . ."Brown v. Board of Education of Topera, 349 U.S. 294 at 300 (1954)

In this case the defendant school board offered no evidence that it had any problems relating to the administration of the school system which would justify a delay in carrying out a full program of school desegregation. On the contrary, the evidence before the Court shows that the burden on i.ts administration of the Savannah-Chatham school system would decrease if the system were desegregated.
A. Successful. Desegregation of Other Prosrams

The Savannah-Chatham County Board of Education has successfully desegregated three other prograns for which it provides teachers. These programs are the manpower program, the headstart program and the tutorial program. (Dep. Gray p. 35)

The tutorial program is in operation in 14 schools. It involves over 3,000 students (Dep. Bargeron, p. 36) and 208 teachers (Dep. Gray, p. 39). The racial composition of the faculty is approximately 9 Negro teachers to each 5 white teachers (Dep. Gray, p. 39). At Hubert Elementary and Junior High School there are 368 students in the tutorial program. They are taught by of white and 8 Negro teachers (Dep. Bryant, p. 170). The tutorial program was operational within a week after it was approved.
B. Current Procedures to Be Simplified

The Boards procedures for forecasting enrollment and establishing school district boundaries are described in detail in Appendix A to this orief. For most steps in this process, two separate sets of records are maintained. Each computation that is made must be made once for Negro schools and once for white schools. The elimination of the dual system would simplify the enrollment and assignment procedures.

The Board's task of determining its need for teachers and filling this need from amony the job applicants is complicated by the fact that the need for teachers in
in Negro schools is only filled from the reservoir of Negro applicants while the need for teachers in the white school is only filled from the reservoir of white applicants. Desegregation of faculties would lessen the administrative burdens connected with teacher placement.

VII<br>The requested retieg is appropriamt

## A. Geographic Assignments

The Savannah-Chathan County Board of Education operated a
dual school system before adopting its desegregation
plan. The Board retained the dual system even after adopting the desegregation plan, merel.y superimposing on the two sets of attendance zones a third set for students who wished to desegregate under the system. Negro students, faculty and staff are assigned to one set of schools and white students, faculty and staff are assigned to another set of schools. Wi.thin each systern, Negro and white, the defendant board assigns pupils according to where they reside. For the administration of a 42,000 student system, with 60 schools, having a capacity of 42,317, this is an efficient assignment system. The United States proposes that the board continue to operate as they have, except that they remove race as a factor and assign students according to where they resjide under a unitary syster.

It is by now settled law that racially dual school. systems may not be maintained, Augusta v. Board of Public Instruction of Escambia Comnty, Florida, 306 F. 2 d 862 (5th Cir. 1962). Where racially dual geographic zones have existed, the court may itself mocify the system into a unitary one, (Dowell v. The School Board of the City of Oklanoma City Public Schools, et al., (W.D. Okla., 1965)), but where possible this task should be performed by the school board itself.

## B. Faculty Desegregation

It is clear that a racially segregated faculty denies Negro students of the equal protection of the laws. Price $v$. The Denison Independent School District Board of Education (No. 21, 632; July 2, 1.965). District Couris have ordered faculty desegregation. See, e.g., Dowall v. The School Board of the City of OkIahona City Public Schools, et al., (W.D. Okla., Sept. 7, 1965) ; Mason v. Jessamine County, Kentucky, Board of Education, Civil Action No. 1496 (E.D. Ky.) orders of January 20, 1903, (8 Race Rel. L. Rep. 75), June 3, 10, 1963; (8 Race Re]. L. Rep. 530), and July 16, 1963; (8 Race Rel. L. Rep. 948), and such orders have been upheld. Board of Public Instruction of Duval County $v$. Braxton, 326 F. 2d 616 (5th Cir., 196!). Such relief is necessary here because complete and meaningful. desegregation can never be achieved if one set of schools con.. tinues to have all Negro faculties while another set has all white faculties.

The proposed order provides a means for beginning the desegregation of staff without undue administrative difficulty.

## c. Reporting Provision

Courts have ordered that written reports be subnitted to aid in the enforcement of its orders. Dowell v. The School. Board of the City of Oflahoma City Public Schools, et al., (W.D. Okla., Sept. 7, 1965) ; United States v. Wilder, 222 F.Supp. 749 (D.C. La., 1963)

## VIII.

THE DEPOSITIONS TAKEN BY FLAINTIFP-JNTERVENOR ON DECEMBER 22, 1965 ARE ADMISSIBLE UNOER RULE 26, FEDERAL RULES OF CIVIL PROCEDURE, AND ARE RELEVANT AND MATERIAL TO THE ISSUES IN THIS CASE

On December 22, 1965, the United States, plaintifemirtervenor, took the depositions of seven officials of the SavannahChatham school system. Included were the depositions of the Director of Transportation, Director of Personnel, Director of Curriculum Development and pupil Services, the Assistant Superintendent, the Principal of Pulaski Elementary School, the Principal of Shuman Junior High School and the Principa? of Hubert Ejementary and Junion High School.

At a hearing held December 29, 1965, the defendant-intervenor objected to the introduction into evidence of these depositions on the grounds that they were not admissible under Rule $26, F . R . C . P .$, and that they were irrelevant and imnaterial.
A. The Deposjtions bl the United States Taken on Decomber 22, 1965 are Admissible vider Rule 26 , F.R.C.P.

Rule $26(\mathrm{~d})$ (2) states that "the deposition of . . . any one who at the time of taking the deposition was an officer, director, or managing agent of a public or private corporation . . . which is a party may be used by an adverse party for any purpose."

Each of the deponents holding the above-named offices in the Savannain-Chatham school system was a managing agent within the meaning of Ruie 26 at the time of the taking of his deposi.. tion.

The federal courts have been liberal in their construction of the term "managing agent" as used in Rule 26(d) (2). In Rubin $v$. General Tire \& Eubber Co., 1.8 F.R.D. 51 (S.D. N.Y. 1955), the court said:

> The term 'managing agent' should not be given a restrictive interpretation. A managing agent is a person invested by the corporation with general powers to exercise his judgent and discretion in dealing wjth corporate matters; he should be a person who could be depended upon to carry out his employer's direction to give testimony at the demand of a person engaged in litigation with the employer, and he should be a person who can be expected to identify himself with the interests of the corporation rather than with those of the other parties.

The depositions of officers, directors or managing agents of govenmental bodies, either federal or municipal, may be used as admissions against the governmental body, since federal corporations as well as municipal corporations "would seem to be enuraced within the term 'public corporation.' " 4 Moore, Federal Practice 26,29 . Several recent cases have in fact held employees of governmental bodies to be "nanaging agents" within the meaning of the rule. In Warren v. United States, 17 F.R.D. 389 (S.D. N.Y. 1955), naval officers in charge of a ship's gun turret were held to be managing agents of the United States. Similarly, the medical director of a Public Health Service Hospital has been held to be a managirg agent of the government for purposes of Rule 26 . Sutherland v. United States, 23 F.R.D. 247 (E.D. N.Y. 1958).

As directors and supervisors of large and significant facets of the operation of the district's schools, deponentis are managing agents for the defendant Eoard of Education. These deponents are invested with general powers to exercise their discretion and judgment in dealing with the operation of the school system, and are persons of superior authority as far as the subject matter of the action is concerned. Warren $v$. United States, supra; Krausse v. Erie R. Co., 16 F.R.D. 126
(D.C. N.Y. 1.95'). The deponents' interests are easily identified with the interests of the school district and with that of the Board of Education. Independent Productions Corp. V. Ioev's Inc., $24 \mathrm{~F} . \mathrm{R} . \mathrm{D} .19$ (D.C. N.Y. 1959).

The three deponents who are principals of schools in the Savannah-Chatham County School Distrjct possess considerable discretion in the conduct of the afairs of the schools under their supervision. Their position in the heirarchy of the county's educational system is comparable in every way to that of a corporation's departmental manager, $7 /$ a ship's captajn or mate, 8 or a hospital director, ${ }^{/ /}$all of whom have been held to be managing agents.

This Court should permit the use of the depositions taken on December 22, 1965 by the Unjted States under Rule 26(d) (2), F.R.C.P. Any existing doubt about whether all parties are in fect managing arents should be resolved in favor of the examining party, because the ultimate determination of whether the defendants shall be bound by their testimony will be made by this court. Unjted States v. The Dorothy MicAllister, 24 F.R.D. 316 (S.D.N.Y. 1959).
B. The Depositions the United States Taken on December 22,1965 are Relevant and Material to this Case

Dr. Marshall, Superintendent of Schools testified, on December 29, 1965 at Brunswick that the Board will continue to operate, under the plan being objected to, in the same way

I/ Krauss V. Erie P. Co., 16 F.R.D. 126 (S.G. N.Y. 1954)
(ranager of a chain department and a chief surgeon held to be managing agents.)
8/Shenker V. United States, 25 F.R.D. 96 (E.D. N.Y. 1960); (Captain of U.S. vessel); Klop v. United Fruit Co., 18 F.R.D. 310, (S.D. N.Y. 1955) (Second mate whilcin charge of vessel.)
2/ Sutherland $v$. United States, 23 F.R.N. 247 (E.D. N.Y. 1958).
that it has been operating during the $1965-66$ school year. unless ordered otherwise by the court. The methods and pro.. cedures of operation in 1965 are therefore relevant to the question of how the proposed plan will operate in 1966 and all future years.

The deposition and attached exhibits are material insofar as they support the objections of the plaintiff-intervenor to the proposed plan. We intend to prove, through the testimony and exhibits that the method of assignment of students, notwithstanding provisions in the pronosed plan to the contrary, is based upon the race of each student and will continue to be based on race, unless this court orders otherwise.

Respectfully Subraitted

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APPENDIX A

## Student Census

In preparation for the $1965-66$ school year, the Savannah-Chatham County Board of Education conducted a survey of the distribution of students by Census Tract and Enumeration District for each school and grade in the school system (Dep. Bargeroń, p. 2).


Chatham County and the City of Savannah have been divided, for purposes of the Federal Census, into areas known as Census Tracts (circled numbers). These areas have been sub-divided into smaller areas, Enumeration Districts (Dep. Bargeron, p. 5).

| MO: | Principals |
| :--- | :--- |
| FROM: | Mrs. Saxon P. Bargeron. Director |
|  | Curriculum Development and Pupil Serviced |
| RE: | Enrollment Forecast |
| DATE: | January 2, 1965 |

Survey forms for reporting grades 1-12 are being issued all schools.
Complete copies one each of city and county districts are being issued to all-schools. In addition a sufficient number of pages which describe the enumeration districts in your school area are being given you so that each teacher may have the sheets needed for reporting her class. A total compilation should be made by each school.

On the last sheet of the total compilation report you will give a grand total by grades. This serves as a check on the total school population report which you give Mrs. Woods. The two shout agree at all grade levels. In addition to the complete district report you are being given 2 or more compilation sheets. It will simplify our recording if you will fill in one of these sheets and return with your complete area report.

Use your enrollment as of January 12 as the basis for your report. Please be sure that the same number of students are recorded as are given on the monthly report sent to Mrs. Woods.

Please return all reports by January 27.1965.
Elementary schools having mentally retarded or fth grace enrichment classes are asked to report these groups separately from regular classes.

On the last page of the elementary report given the total in the regular classes, mentally retarded and 6 th grade enrichment classes as in the following example:


Jr. high schools report regular classes, $7-8$ combinations $\%$ 伿 grade Algebra and mentally retarded classes separately. Include Algebra 11 as regular fth grade students. On the last page report as in example below:

GRADES: $\frac{7}{193} \frac{8 \cdot}{452} \quad 7-8$ Comb. Eth Alg. $\frac{1}{30} \frac{9}{393}-\frac{\text { Total }}{1098} \frac{\text { Sp. Ed. Grand Total }}{15}$

On January 2, 1965, a memorandum was forwarded to the principal of each school, giving instructions on how the survey was to be conducted (Dep. Bargeron p. 3; Ex. 15).

Senio－hinh schools report present 10，11， 12 and special education．Schools havines Sp．Jd．classes will be givon complete city and county descriptiona for reporiang these pupils．


Nap：arebeing issucd in Jamuary，39́5．Thescmapshave the old and new strect iames wherethese strects appear on the maps，howevermere are stacer whit hew hames that are not on our maps．You aro being given a copy of ail the olci nad aew hames with the consus tract ardenumeration districts wisere toy appoar．it is sugecoted you licep this iist of names in your file for future zeiorence．These maps will enable teachers to locate，mbre casily， sưucais out of the district．When a student lives on a street which divides
 shoú E e reportca．

ㅇ．．nubers usually indicate the north side of a strect，uneven numbers the
 ジロージャะ on the wost．
wociah care is urged in reporting．Luagt－year in one or two instances several juis $\boldsymbol{y}$ ，one grade level only were reported as living in a given area，for examglé：

## GRADES：

玉． 4


A similar thing happened in the secondary schools．We uxge those who are responsible for compiling these reports to double check on such unusual circumstances．

The following will be dua on January $27,1965$.
1．One complete city area report（iabulation forms）
2．One completo county aroa report（tabulation forms）
3．One complete compilation sheet，


SAVANNAH AND Chatham COLNTY PUBLIC SChOOLS
SENIOR HIGH COMPILATION SHEET

|  |  |  |
| :---: | :---: | :---: |
|  |  |  |

$\qquad$
PRINCIPAL: $\qquad$
Date: $\qquad$


Principals also receive blank forms, known as compilation sheets, upon which to record the number of students, then enrolled, for each Enumeration District by grade (Dep. Bargeron, p. 5; Ex, 15).

A- 6


$\therefore$ Ca_ - $\qquad$
$E D$ - Enumeration District
$\because$ _iacip=i: $\qquad$

-     - . e: $\qquad$



Forecasting Enrollment

By the end of January, 1965 the principals returned the completed compilation sheets to the Board of Education (Dep. Bargeron, p. 6, 16, 17; Exc. 16-18, 17-19).



The data from principals' reports is then posted on cards which are filed in two boxes (Dep. Bargeron, p. 5,6,19; Exs. 20,21)--one box for white schools (Dep. Bargeron, p. 19; Ex. 20) and one box for Negro schools (Ex. 21).



As the data was posted on the cards, the students reported by the principals to be in a particular grade were advanced one grade (Dep. Bargeron, p. 19, 20; Exs. 20, 21). Note, on this and the next page, that students in the circled Enumeration District are attending two sets of schools--this page white, next page, Negro.

$$
A-11
$$




On February 1, 1965, the data on the cards in the box for white schools was totaled, by grade, and transposed to a master compilation sheet which showed by Enumeration District and grade, the actual enrollment of white schools, advanced one grade (Dep. Bargeron, pp. 6, 21, 22; Ex. 22).

SAVANNAH AND CHATHAM COUNTY PUBLIC SCHOOLS
ELEMENTARY COMPILATION SHEET
*Ct - Citr Census
CC - Countr Census
ED - Enumeration District

PaINQIPAL: $\ldots$


The same compilation for Negro schools
was made on February 2, 1965 (Ex. 23).


Then, to reflect failures, dropouts and other shifts of student population, a "survival" formula, showing enrollment trends in each grade, was applied to the actual enrollment, advanced one grade compilation sheets for white students (Dep. Bargeron, pp. 22, 23; Ex. 24).


A similar formula was applied to the compilation
sheets showing actual enrollment, advanced one grade for Negro students. (Ex. 25)


| SAVANNAH ANO CHATHAM COUNTY PUBLIC SCHOOLS ELEMENTARY COMPILATION SHEET <br> *Ct - City Census <br> CC - Countr Census <br> eo - Enumeration District <br> School: $\qquad$ Cu.....t... <br> Principal: $\qquad$ <br> Date: $28+0,1965$ $\qquad$ |  |  |  |  |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  |  |  |  |  |  |  |  |  |  |  |  |
| * 0 | EO $\overbrace{\text { GRaDE }}$ |  | 2 |  |  |  |  |  |  |  |  |  |
| $\begin{aligned} & \text { OR } \\ & \text { CC } \end{aligned}$ |  |  | 3 | 4 | 5 | 6 | $\begin{gathered} \overline{\text { ENR. }} \\ 6 \end{gathered}$ | 7 | total | $\\| \begin{aligned} & \text { Sp } \\ & E 0_{i} \end{aligned}$ | $\begin{aligned} & \text { GRAND } \\ & \text { TOTAL } \end{aligned}$ |
| 111 |  |  |  |  |  |  |  |  |  |  |  | . |  |
| 18 |  |  |  |  |  |  |  |  |  |  |  |  |
| $\sim$ |  |  |  |  |  |  |  |  |  |  |  |  |
| $2=N$ |  |  |  |  |  |  |  |  |  |  | , |  |
| $3 p$ |  |  |  |  |  |  |  |  |  |  | , |  |
| 3 R |  |  |  |  |  |  |  |  |  |  |  |  |
| 41 |  |  |  |  |  |  |  |  |  |  |  |  |
| $4 P$ |  |  |  |  |  |  |  |  |  |  |  |  |
| 1. |  | 6 | 6 | 1 | 1 |  | 2 |  |  | 19 | - |  |
| 4116 |  |  |  | 2 | 2 | 1 |  |  |  | 5 | , |  |
| 17 |  | $\because$ | 3 | 3 | 1 | $\because$ | 5 |  |  | 19 | 5 |  |
| 9 |  |  |  |  |  |  |  |  |  |  | 1 |  |
| 110 |  | 19 | 18 | 23 | 23 | 26 | 14 |  |  | 122 |  |  |
| 111 |  | 3 | 2 | 2 |  | 3 |  |  |  | $\cdots$ | c |  |
| $6 \quad 12$ |  |  |  |  |  |  |  |  |  |  | , |  |
| 人3 |  |  |  |  |  |  |  |  |  |  |  |  |
| $14 N A$ |  |  |  |  |  |  |  |  |  |  | $c$ |  |
| $148 B$ |  |  |  |  |  |  |  |  |  |  | 2 |  |
| L14P |  | 5 | 5 | 4 |  | 1 | 2 |  |  | 19 |  |  |
| 1, 15 |  | \% | 2 |  | 1 |  |  |  |  | 5 | $\stackrel{1}{2}$ |  |
| 116 |  |  | 1 |  |  |  |  |  |  |  | 1 |  |

Exhibit 24 consists of a set of documents resulting from the application of the enrollment trend formula to students enrolled in white schools (Dep. Bargeron, p. 23).

SAVANNAH AND CHATHAM COUNTY PUBLIC SCHOOLS C.... \% is
ELEMENTARY COMPILATION SHEET
*Ct-Citr Census
CC - Countr Census
eD - Enumeration oistrict

PRINCIPAL:
DATE: $7, \overline{2} \ldots \ldots, 10,15!-1$


Exhibit 25 consists of a similar set of documents resulting from the application of the encollment trend formula to students enrolled in Negro schools (Dep. Bargeron, p. 23).

## Making Assignments

In addition to the forecasted enrollment, shown in Exhibits 24 and 25 , such factors as natural boundaries, proximity, capacity, school use, and continuity must be considered in estabIishing school districts.

## 1. Natural Boundaries and Proximity

Proximity is the primary basis upon which Enumeration Districts are assigned to schools. However, assignment by proximity alone may result in causing students to cross natural barriers.


## 2. Capacity

Capacity is a variable which is dependent upon the number of classrooms in the school and the pupil-teacher ratio set by the Board of Education.

For the 1965-66 school year, the SavannahChatham County Board of Education computed capacity on the basis of a $32.5: 1$ pupil-teacher ratio for elementary schools and a $30: 1$ pupilteacher ratio for secondary schools (Dep. Bargeron, p. 43). The Board is attempting to reduce the pupil-teacher ratio further to $30: 1$ for elementary schools and 25:1 for secondary schools (Dep. Bargeron, p. 43, 44).

Thus the capacity of a ten classroom school will vary according to the pupil-teacher ratio set by the Board:

| Ratio | Capacity |
| :---: | :---: |
| $26.8: 1$ | 268 |
| $30: 1$ | 300 |
| $32.5: 1$ | 325 |
| $35: 1$ | 350 |

3. School Use

The use to which a school is put is an important factor in the assignment of students.

For example, if an elementary school cannot conveniently accommodate grades one through six because of overcrowding, the school could be converted to serve only grades one through four. The fifth and sixth graders would then be assigned to another school. Thus pupils residing in Enumeration Districts assigned to Anderson Elementary attend grades one through four in that school (Ex. 28). Fifth and sixth graders residing in the same Enumeration Districts are assigned to the Henry Elementary school (Ex. 28).

Similarly, Butler Elementary School receives fifth and sixth graders who have completed four grades at Barnard Elementary (Ex. 28).
4. Splitting of Enumeration Districts

Enumeration Districts can and have been split in instances, such as described in the preceeding paragraph, where students in the same Enumeration District are assigned to different schools according to the grades they attend.

An Enumeration District can also be split geographically (Dep. Bargeron, pp. 56, 57, 58).

That is, in order to conveniently meet the capacity limits of two schools which are located relatively close to one another, it is often necessary to create new Enumeration Districts by splitting existing ones into two or more parts.


For example, in Census Tract $36-\mathrm{B}$, Enumeration Districts were originally numbered 105,106, 107, and 108. Enumeration District 105 has been split into $105 \mathrm{NA}, 105 \mathrm{NB}$, and 105P. Enumeration District 106
has been split into 106NA, 106NB, 106PA and 106PB.
Enumeration Districts 107 and 108 have been similarly split.

## 5. Continui.ty

In the assignment of Enumeration Districts to schools, care must be taken to prevent the uprooting of students from their classes and schools in the middle of a school level. That is, it is educationally undesireable to take a student from an elementary school which he has been attending for four years and assign him to a different school, thereby separating him from familiar surroundings and from his friends.

Nevertheless, because of the Iimitations of capacity, proximity and natural boundaries, the uprooting of a student in the middle of a school level is often unavoidable. The following tables demonstrate changes made in the assignment of Enumeration Districts from the 1964-65 school year to the $1965-66$ school year (Exs. 3, 4, 29, 30) and presently planned changes for the 1966-67 school year which necessarily result in the uprooting of students (Exs. 27, 28).

GANGED STUDENT ASSIGNMENTS VITHIN SCHOOL LEVEL*

From Gould Elementary School. To Jacob Smith Elementary School

| Enumeration District | Jst Gracie | 2nd Grade | 3rd Grade | 4th Grade | 5th Grade |
| :---: | :---: | :---: | :---: | :---: | :---: |
| 16NA | 1 | 0 | 0 | 0 | 1 |
| 16NB | 0 | 0 | 0 | 0 | 0 |
| 16NC | 0 | 0 | 0 | 0 | 0 |
| 16 P | 13 | 7 | 12 | 6 | 6 |
| 17 NA | 1 | 1 | 2 | 0 | 1 |
| 17NB | 5 | 3 | 5 | 3 | 3 |
| 15N | 2 | 8 | 1 | 3 | 3 |
| 159 | 2 | 2 | 2 | 1 | 2 |
| Sub Totals Total: 96 | 24 | 21 | 22 | 13 | 16 |

From Howard Elementary School. To Tybee Elementary School

| Enumeration <br> District | lst Gracle | 2nd Grade | 3rd Grade | 4th Grade | 5th Gra |
| :--- | :--- | :--- | :--- | :--- | :--- |
| 31PA 1 0 0 1 |  |  |  |  |  |
| SubTotals | 1 | 0 | 0 | 1 | 0 |

Total: 2

* This table was derived from a comparison of the 1965-66 boundaries for schools, (Exs. 3, 4) with the 1964-65 boundaries for schools, (Exs. 29, 30).

$$
A-26-a
$$

From East Broad Elementary School To Spencer Elementary School

| Enumeration District | 1st Grade | 2nd Grade | 3 Bd Grade | 4th Grace | Sth Grade |
| :---: | :---: | :---: | :---: | :---: | :---: |
| $9{ }^{\text {¹ }}$ | -- | -- | -- | -- | -- |
| 10 | 0 | 0 | 0 | 2 | 0 |
| 11 | 10 | 9 | 5 | 4 | 9 |
| Sub Totals | 10 | 9 | 5 | 6 | 9 |

Total: 39

Fron Hubert Elementary School To Spencer Elementary School
Enumeration
District 53*

From Wilder Junior High School To Bartlett Junior High School.
Enumeration

| District | 7 th Grade | 8 th Grade |
| :--- | :---: | :---: |
| 34 A | 1 | 1 |
| 34 BA | 0 | 1 |
| 34 BB | 0 | 3 |
| 34 CA | 17 | 10 |
| 35 N | 10 | 10 |
| 7 A | 0 | 0 |
| $7 B$ | 6 | 6 |
| Sub Totals | 34 | 31. |

Total: 65

* The boundaries cut throuçh a portion of this Enumeration District. Student Population of the area cannot be ascertained as population is reported for an entire Enumeration District.

$$
A-26-b
$$

Fron Beach Junior Hjegh School to Cuyler Junior High School
Enumeration

| District |  | 7 th Grade |
| :--- | :---: | :---: |
| 59 N | 11 | 8 Grade |
| 59 P | $\frac{8}{19}$ | -9 |
| Sub Totals | 19 | 19 |

Grand Total* 240

* There may be additional uprooting due to the boundary changes between Bloomingdale Elementary School and Pooier Elementary School; however, the exact changes could not be accurately ascertained with the maps available to the plaintiff-intervenor.

$$
A-25-C
$$



PROPOSED SOHOOL ASSIGNMENT CHANGES NITHIN SCHOOL LEVEL.

| Enumeration District | Anderson Elementary School | Henry Elementary School |
| :---: | :---: | :---: |
|  | 2nd Grade 3rd Grade 4th Grade | Sth Grade 6th Grade |
| 39A | $25 \quad 37$ | 1918 |
| 46AA | $21 \quad 1919$ | 1315 |
| 46 BA | 14 8 9 | $7 \quad 4$ |
| 47A | $\begin{array}{ll}5 & 4\end{array}$ | 38 |
| 47B | 26 | 02 |
| 49B | $\begin{array}{ll}6 & 4\end{array}$ | 7110 |
| 49D TOTAL | $5-1-\frac{0}{61}$ | 1 |
| Enumeration District | Scott Jr. High School | Tomplins High School |
|  | 7th Grade | 8th Grade 9th Grade |
| 12 | 38 | $27 \quad 37$ |
| 13 | 24 | 2716 |
| 14 NA | 13 | 16 14 |
| 14 NB | 13 | 12 8 |
| 14 P | 17 | 16 26 |
| 15 | 23 | $25 \quad 24$ |

PROPOSED SCHOOL ASSIGNMENT CHANGES WITHIN SCHOOL LEVEL

| Enumeration District | Scott Jr. Migh School | Tomplins High School |
| :---: | :---: | :---: |
|  | 7th Grade | 3th Grade ath Orade |
| 15 | 33 | $58 \quad 59$ |
| 82A | 9 | 4.3 |
| 82 B | 1 | 1.3 |
| 83N | 10 | $11 \quad 16$ |
| 839 | 3 | $3 \quad 4$ |
|  | TOTAL 184 |  |
|  | Scott Jr. High School | Tompkins lith School |
|  | 7th Grade 8th Grade | 9th Grade |
| 17NA | $11 \quad 4$ | 10 |
|  | TOTAL 4 |  |

FROPOSED SCHOOL ASSIGNMENT GHANGES WITHIN SCHOOL LEVEL


| Enumeration District |  | Cuyler Jr. High School | Scott Jr. High School |
| :---: | :---: | :---: | :---: |
|  |  | 7 th Grade | 8th Grade 9th Grade |
| 84 |  | 35 | 43 |
| 85 | TOTAL | $-\frac{41}{76}$ | $26 \quad 22$ |
| Enumeration District |  | Beach Jr. High School | Beach High School |
|  |  | 7th Grade 8th Grade | 9th Gracie |
| 121A |  | 2211 | 19 |
| 121B |  | 22 | 1 |
| 18 N |  | 15 - 20 | 6 |
|  | TOTAL | 33 |  |

Mra Jenkins - 7th grade formerly scheduled for Arnold will attend Ellis

SAVANNAH AND CHATHAM COUNTY PUBLIC SCHOOLS
ELEMENTARY COMPILATION SHEET

```
*CT - City Census
CC - Countr Census
    ED - Enumeration District
```

SChOOL: $\qquad$
PRINCIPAL: _ dínomore Martefentins
Oate: $\qquad$ 365
if


By March 16,1965, all Enumeration Districts had been assigned to both the Negro and white schools.

As the circled example shows, the same Enumeration Districts were assigned to two sets of schools. White students residing in Enumeration District 96PB were assigned to Smith Elementary, Wilder Junior High and Jenkins High. Negroes living in the same place were assigned to Spencer Elementary and Johnson Secondary.

$$
A-27
$$

SAVANNAH AND CHAThAM COUNTY PUBLIC SCHOOLS

> JUNIOR HIGH SCHOOL COMPILATION SHEET $\frac{\text { FORECABT }}{\text { WIlder }}$

> $$
\begin{array}{l}\text { SCHOOL: Mr. Georze Ball } \\ \text { PRINCIPAL: } \frac{\text { March 12, } 1965}{}\end{array}
>
$$

CT - Ciry Census
Co - County Census
ED - Enumeration District


| $\begin{aligned} & C T \\ & \text { OR } \\ & C C \end{aligned}$ | ED | \% | EnR. 7 | 8 | 9 | $\begin{aligned} & \text { ЗTM } \\ & \text { COMB. } \end{aligned}$ | $\begin{gathered} \text { AI.G. } \\ 2 \\ \hline \end{gathered}$ | total | $\begin{aligned} & \mathrm{Sp} . \\ & \mathrm{ED} . \\ & \hline \end{aligned}$ | $\begin{aligned} & \text { Grano } \\ & \text { Total } \end{aligned}$ |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| 22 | 5613 |  |  |  |  | $1+$ |  | 1 |  |  |
|  | 57 D |  |  |  |  | 1 |  | 1 |  |  |
| 29 | 77 B | 5 |  | 7 | 5 |  |  | 17 |  |  |
| 34 | 83 | 1 |  |  |  |  |  | 1 |  |  |
|  | 89 | 4 |  | 4 |  |  |  | 8 |  |  |
|  | 90A | 15 |  | 14 | 17 | 1 |  | 47 |  |  |
|  | 31A | 24 |  | 13 | 27 | 2 |  | 71 |  |  |
|  | 913 | 11 |  | 13 | 7 |  |  | 31 |  |  |
|  | 92 | 17 |  | 9 | 9 | 1 |  | 36 |  |  |
|  | 93A | 9 |  | 8 | 8 | 2 |  | 27 |  |  |
|  | 43B | 22 |  | 18 | 20 |  |  | 60 |  |  |
|  | $9+\mathrm{A}$ | 4 |  | 5 | 1 |  |  | 10 |  |  |
|  | 94 B | 11 |  | 6 | 5 |  |  | 22 |  |  |
| 35A | 95 |  |  |  |  | 1 |  | 1 |  | I |
|  | 96 NB | 2 |  | 2 | 2 |  |  | 6 |  |  |
|  | 96PA | 7 |  | 9 | 6 |  |  | $2 ?$ |  |  |
|  | (96PB | 13 |  | 11 | 11 |  |  | 35 |  |  |
| 35B | 98P |  |  |  |  | 1 |  | 1 |  |  |
|  | 97 |  |  |  |  | 1 |  | 1 |  | ! |

## SAVANNAH ANO CHATHAM COUNTY PUBLIC SCHOOLS

## SENIOR HIGH COMPILATION SHEET

```
*Ct - Citr Census
cC - Countr Census
eo - Enumeration District
```

School: JENKINS
Principal: Mr. James Reynolds
Date: March 16, 1965


SAVAINIA:H ANO CHATHAM COUNTY PUBLIC SCHOOLS
elementary comfilation sheet
*CT - Citr Census
CC - County Census
ED - Enumeration Distrigt

SCHOOL: SPENCER_C_
PRINCIPAL:
Date: $\qquad$


SAVANNAH AND CHATHAN: CUUNTY PUBLIC SCHCCLS
SECUNDAFYCこNPILATI:NSHEET

:CT - City Census<br>CC - County Census<br>ED - Enumeration District

Schuol: JOHNSON .'
P:incipal: March 15. 1965..
Date: $\qquad$



SAVANNAH AND CHATHAM COUNTX PUBLIC SCHOOLS
BOUNDARX LINES
SCFCOL YEAR 1965-66
GRADES 10-11-12

## BEACK SR. HIGH

Will serve the area bound by the Savannah River from the extension of East Lathrop Ave. to Price St.; Middle of Price to Victory Drive; Middle of Victory Drive to Bull St. ; Midale of Bull St. to DeRenne Ave.; Middle of DeRenne Ave. to the northern boundary of Hunter. Field; Northern boundary of Hunter Field to ACL RR.; ACL RR. to Staley Ave.; Staley Ave., but not including anyone on Staley, to ACL Boulevard; ACL Boulevard, but not including anyone on ACL Boulevard, to 52nd St. Extended; 52nd St.Extended, but not including anyone on 52 nd St. Extended, to Ogeechee Road; Ogeechec Road, but not including anyone on Ogeechee Road, to SAL RR.; SAL RR. to Blun Ave.; Blun Ave., but not including anyone on Blun, and an extension to Springfield Canal; Springfield Canal to Louisville Road; Louisville Road, but not including anyone on Louisville Road, to East Lathrop Ave.; East Lathrop Ave., but not including anyone on East Lathrop Ave., to Savannah River.

Will serve the area bound on the north by the Savanmah River from the county line on the west to the Wilmington River; Wilmington River to the Causton Bluff Road; Causton Bluff Road to an extension of "C"St. (Celia); Extension of "C"St. (Celia) to Greenwood Ave. (Gregory); Midale of Greenwood Ave. (Gregory) to Liberty St. (Capital); Middle of Liberty St. (Capital) and extension to Springfield Canal; Springfield Canal to city limits; City limits to $A C L R R ; A C L R R$ to Forest River; Forest River to Grove River; Grove River to Rock Fish Creek; Rock Fish Creek to Ogeechee River; Ogeechee River to the western county line; Western county line to the Savannah River.

The assignment of Enumeration Districts was
then described in two ways. First, the boundary
lines of the area assigned to each school were
described. (Exs. 3, 4)

# ELENENTARY SCHOOLS 

GRADES 1-6

ANDERSON

BARNARD

BARTOW

Will serve the area bound by the middle of Gwinnett St. from Abercorn St. to Price St.; Middle of Price St. to Bolton St.; Middle of Bolton St. to East Eroad St.; Middle of East Broad St. to Gwinnett St. ; Middle of Gwinnett St. to ACL RR.; ACL RR. to 34th St.; Middle of 34th St. to Bull St.; Middle of Bull St. to Anderson St.; Middle of Anderson St. to Abercorn; Middle of Abercorn St. to Gwinnett St.

Grades 5 and 6 in this district will attend Henry

Will serve the area bound by the Savannah River from the extension of East Lathrop Ave, to Eull St.; Middle of Bull St. to Gaston; Middle of Gaston St. to West Boundary; Middle of West Boundary to Louisville Road; Louisville Road, but not including anyone on Louisvilie Road, to East Lathrop Ave.; East Lathrop, but not including anyone on East Lathrop, and extension to Savannah River.

Grades 5 and 6 in this district will attend Butlex

Will serve the area bound by the Savannah River from an extension of West Lathrop Ave. to an extension of Carolan St.; Middle of Carolan St. to Bay St.; Middle of Bay St. to Hudson Ave.; Middle of Hudson Ave, to McIntire St.; Middle of Mcintire St, to Augusta Ave.; Middle of Augusta Ave. to Louisville Road; Louisville Road, but not including anyone on Louisville Road to SAL RR.; SAL RR. to city limits; City limits to West Lathrop Ave.; West Lathrop Ave., both sides, and extension to Savannah River.

Will serve the area bound by the Pipe Niakers Canal from Effingham county line to an extension of Jackson Ave. (iviesa); Jackson Ave. (iVesa), but not including anyone on Jackson Ave. (Mesa), to the Pine Barren Road at the Little Cgeechee River; Pine Barren Road, both sides, to Bryan county line; Bryan county line to the Effingham county line; Effingham county line to the Pipe Nakers Canal.

Bloomingdale will also serve Georgia Highway 204 from the Pine Barren Road to a distance of l1/2 miles.
i


SAVANNAH AND CHATHAM CCUNTY PUBLIC SCHOOLS
CENSUS TRACTS AND ENUMERATION DISTRICTS ASSIGNED TO SCHOOLS


By April 1, 1965, lists were drawn showing the schools to which the Census Tracts and Enumeration Districts were assigned. The two lists reflect white assignments (Ex. 27) and Negro assignments. (Ex. 28)

SAVANNAH AND CHATHAM COUNTY PUBLIC SCHOOLS
CENSUS TRACTS AND ENUMERATION DISTRICTS ASSIGNED TO SCHOOLS
APRIL 1, 1965

| $\begin{array}{r} C T \\ o r \\ C C \end{array}$ | ED | $\frac{\text { GRADES }}{1-6}$ | 7 | 8 | 9 | 10-11-12 |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| 1 | no 1N ${ }_{1 P}$ | Barnard (1-4) <br> Butler (5-6) | Cuyler | Cuyler | Cuyler | Beach Sr. |
|  |  | Barnard (1-4) <br> Butler (5-6) | Cuyler | Cuyler | Cuyler | Beach Sr. |
|  | 2 | Barnard (1-4) <br> Butler (5-6) | Cuyler | Cuyler | Cuyler | Beach Sr. |
| 2 | 3N | Barnard (1-4) <br> Butler (5-6) | Cuyler | Cuyler | Cuyler | Beach Sr. |
|  | 3P | Barnard (1-4) <br> Butler (5-6) | Cuyler | Cuyler | Cuyler | Beach St. |
|  | 3R | Barnard (1-4) <br> Butler (5-6) | Cuyler | Cuyler | Cuyler | Beach Sr. |
|  | 4N | Barnard (1-4) <br> Butler (5-6) | Cuyler | Cuyler | Cuyler | Beach Sr. |
| 3 | 4 P | Barnard (1-4) <br> Butler (5-6) | Hubert | Hubert | Hubert | Beach Sr. |
|  | 5 | Barnard (1-4 <br> Butier (5-6) |  |  | Hubert | Beach Sr |
|  |  | ${ }^{-3}$ at B- |  |  |  | , |



At the end of June, 1965, Board of Education employees
responsible for assignment and forecasting, transposed
data which they received concerning failures, promotions,
dropouts, and desegregation transfers to an adjusted
forecast. (Dep. Bargeron, pp. 41, 42; Ex. 37)

$$
A-36
$$



Date May 3, 1965
Home Address of Pupil 647 East 32 ne street
Grade for Which Applying tenth the de (10)
School From Which Transfer is Desired Sol Ce follensow Wight Shat
School in Attendance Area (Shown on Back) to Which Transfer is Requested: bent on in


 enieerix the prentice. It will encourage yens mere and lien ouse in tel puttee.


Signature of Pare of wardian
b478ast and Street
Address of Parent or Guardian
Ad 2-0903
Telephone

APPENDIX C

SAVANNAH AND CHATHAM COUNTY PUBLIC SCHOOLS
CENSUS TRACTS AND ENUMERATION DISTRICTS ASSIGNED TO SCHOOLS
APRIL 1, 1965





## COUNTY

| or | GRADES |  |  | 8-9 | 10-11-12 | Excentic |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| CC | FD | 1-6 | 7 |  |  |  |
| 38 | 111 N | Thunderbolt | Miyers | Myers | Jenkins |  |
|  | 111 PA | Thunderbolt | Myers | Myers | Jenkins |  |
|  | 111 PB | Low | Myers | Myers | Jenkins |  |
| 39 | 112A | Ellis | Miyers | Myers | Jenkins |  |
|  | 112 B | Ellis | Myers | Myers | Jenkins |  |
|  | 112 C | Low | Wilder | Wilder | Jenkins |  |
|  | 112 DA | Thunderbolt | Wilder | Wilder | Jenkins |  |
|  | 112 DB | Isle of Hope | Wilder | Wilder | Jenkins |  |
| 40 | 113 | Heard | Wilder | Wilder | Jenkins |  |
|  | 114A | Heard | Wilder | Wilder | Jenkins |  |
|  | 114 B | Isle of Hope | Wilder | Wilder | Jenkins |  |
|  | 114 C | Heard | Bartlett | Bartlett | Jenkins |  |
|  | 114D | Hesse | Bartlett | Bartlett | Jenkins |  |
|  | 115 | Heard | Wilder | Wilder | Jenkins |  |
|  | 116A | Heard | Wilder | Wilder | Jenkins |  |
|  | 116BA | Heard | Wilder | Wilder | S.H.S. |  |
|  | 116 BB | Pulaski | Chatham | S.H.S. | S.H.S. |  |
|  | 116 C | Heard | Wilder | Wilder | S.H.S. |  |
|  | 117A. | Heard | Wilder | Wilder | S.F.S. | Those witl |
|  | 117 BA | Heard | Wilder | Wilder | Jenkins | choice may |
|  | 117 BB | Heard | Wilder | Wilder | Jenkins | attend S.F. |
|  | 117C | Heard | Wilder | Wilder | Jenkins | or Jenkins |
|  | 117DA | Heard | Wilder | Wilder | S.H.S. |  |
|  | 117 DB | Pulaski | Bartlett | Bartlett | S.E.S. |  |
|  | 117 EA | White Bluff | Bartlett | Bartlett | S.H.S. |  |
|  | 117 EB | White Bluff | Bartlett | Bartlett | Jenkins | Choice 12 |
|  | 117 F | Heard | Bartlett | Bartlett | Jenkins | Choice 12 |
| 41 | 118 NA | Hesse | Bartlett | Bartlett | Jenkins |  |
|  | 118 NB | Hesse | Bartlett | Bartlett | Jenkins |  |
| 42 | 118 PA | Isle of Hope | Bartlett | Bartlett | Jenkins |  |
|  | 118 PB | White Bluff | Bartlett | Bartlett | S.H.S. |  |
|  | 118 PCA | White Bluff | Bartlett | Bartlett | Jenkins | Choice 12 |
|  | 118 PCB -pel | Windsor | Bartlett | Bartlett | Jenkins | Choice 12 |
|  | 118 PD | Windsor | Bartlett | Bartlett | Jenkins | Choice 12 |
|  | 118 PE | Windsor | Bartlett | Bartlett | Jenkins | Choice 12 |
| 42 | 118PF | Windsor | Bartlett | Bartlett | S.F.S. |  |
| 43 | 119-120S | Pulaski | Chatham | S.H.S. | Jenkins |  |
| 44 | 121A | Pulaski | Chatham | S.H.S. |  |  |
|  | 121 B | Pulaski | Chatham | S.H.S. | S.H.S. |  |
|  | 121 C | Ellis | Ellis | S.H.S. | S.H.S. |  |
| 101 | 1 N | Whitney | Shuman | Shuman | S.H.S. |  |
|  | 1 P | Whitney | Shuman | Shuman | S.H.S. |  |
|  | 1R-S-T | Whitney | Shuman | Shuman | S.H.S. |  |
|  | 1 L | Herty | Shuman | Shuman | S.H.S. |  |
|  | 1 W | Thunderbolt | Myers | Myers | Jenkins |  |
|  | 1X 2 | Thunderbolt | Miyers Miyers | Myers Myers | Jenkins |  |
|  | 4N | Thunderbolt | Wilder | Wilder | Jenkins |  |
|  | 4PA | Thunderbolt | Myers | Myers | Jenkins |  |
|  | 4PB | Isle of Hope | Wilder | Wilder | Jenkins |  |
|  | 45 | Thunderboit | Myers | Miyers | Jenkins |  |
| 102 | 4R | Isle of Hope | Wilder | Wilder | Jenkins |  |
|  |  |  | C-5 |  |  |  |


| or |  | GRADES 7 |  | 8-9 | 10-11-12 | Exceptio |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| CC | ED |  |  |  |  |  |
| 105 | 15N | Smith | Chatham | Chatham | Groves |  |
|  | 15P | Smith | Chatham | Chatham | Groves |  |
|  | 16NA | Smith | Chatham | Chatham | Groves |  |
|  | 16 NB | Gould | Chatham | Chatham | Groves |  |
|  | 16NC | Gould | Chatham | Chatham | Groves |  |
|  | 16ND | Gould | Chatham | Chatham | Groves |  |
|  | 16 P | Gould | Chatham | Chatham | Groves |  |
|  | 17NA | Smith | Chatham | Chatham | Groves |  |
|  | 17 NB | Smith | Chatham | Chatham | Groves |  |
|  | 17 P | Gould | Chatham | Chatham | Groves |  |
|  | 17RA | Gould | Chatham | Chatham | Groves |  |
|  | 17RB | Gould | Chatham | Chatham | Groves |  |
|  | 175 | Gould | Chatham | Chatham | Groves |  |
|  | 18 N | Gould | Chatham | Chatham | Groves |  |
|  | 18 P | Gould | Chatham | Chatham | Groves |  |
|  | 18RA | Gould | Chatham | Chatham | Groves |  |
|  | 18RB | Gould | Chathem | Chatham | Groves |  |
|  | 19 N | Gould | Chatham | Chatham | Groves |  |
|  | $42 A A-42 A B$ | Gould | Chatham | Chatham | Groves |  |
|  | 42 B | Gould | Chatham | Chatham | Groves |  |
| 106 | 19 P | Sprague | Miercer | Mercer | Groves |  |
|  | 19R | Sprague | Mercer | Mercer | Groves |  |
|  | 20 | Sprague | Mercer | Mercer | Groves |  |
|  | 21 N | Strong | Niercer | Mercer | Groves |  |
|  | 218 | Pooler | Mercer | Mercer | Groves |  |
|  | 21 R | Sprague | Miercer | Mercer | Groves |  |
|  | 225 | Sprague | Niercer | Mercer | Groves |  |
|  | 217 | Sprague | Miercer | Mercer | Groves |  |
|  | 22A | Sprague | Mercer | Mercer | Groves |  |
|  | 22 B | Sprague | Niercer | Mercer | Groves |  |
|  | 22 C | Sprague | Niercer | Mercer | Groves |  |
|  | 23A | Sprague | Mercer | Mercer | Groves |  |
|  | 23B | Sprague | Niercer | Mercer | Groves |  |
|  | 24A | Sprague | Niercer | Mercer | Groves |  |
|  | 24 B | Sprague | Niercer | Mercer | Groves |  |
|  | 25 | Sprague | Mercer | Mercer | Groves |  |
|  | 26 | Sprague | Mercer | Mercer | Groves |  |
|  | 27NA | Sprague | Mercer | Mercer | Groves |  |
|  | 27 NB | Sprague | Mercer | Mercer | Groves |  |
|  | 27 P | Sprague | Miercer | Mercer | Groves |  |
|  | 27R-S-T | Sprague | Miercer | Mercer | Groves |  |
|  | 27 U | Sprague | Mercer | Mercer |  |  |
| 107 | 27W | Strong |  | Miercer | Groves |  |
|  | 27X | Strong | Mercer | Mercer | Groves |  |
|  | 27Y | Strong | Mercer | Mercer | Groves |  |
|  | 28N | Pt. Wentworth | Niercer | Mercer | Groves |  |
|  | 28P | Strong | Mercer | Mercer | Groves |  |
|  | 285 | Pt. Wentworth | Mercer | Mercer | Groves |  |
|  | 28 T | Pt. Wentworth | Mercer | Mercer | Groves |  |
|  | 28 UA | Pt. Wentworth | Mercer | Mercer | Groves |  |
|  | 28 UB | Strong | Mercer | Mercer | Groves |  |
|  | 28W | Strong | Mercer | Mercer | Groves |  |
|  | 2AA | Pt. Wentworth Pt . Wentworth | Mercer | Mercer | Groves |  |
|  | $2 A B$ | Strong | Mercer | Mercer | Groves |  |
|  | 2 B | Strong | Mercer | Mercer | Groves |  |
|  | 3 | Strong | Mercet | Mercer | Groves |  |
|  |  |  | C-6 |  |  |  |

[^4]
$$
c-7
$$

SAVANNAH AND CHATHAM COUNTY PUBLIC SCHOOLS
CENSUS TRACTS AND ENUMERATION DISTRICTS ASSIGNED TO SCHOOLS
APRIL 1, 1965





| $\begin{aligned} & \text { CT } \\ & \text { or } \\ & \text { CC } \\ & \hline \end{aligned}$ | ED | $\frac{\text { GRADES }}{1-6}$ | 7 | 8 | 9 | 10-11-12 |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| 26 | 67 N | 38th | Johnson | Johnson | Johnson | Johns on |
|  | 67 P | 38th | Johns on | Johns on | Johnson | Johns on |
|  | 67R | 38th | Johns on | Johnson | Johnson | Johnson |
|  | 68A | 38th | Johnson | Johns on | Johnson | Johnson |
|  | 68B | 38th | Johnson | Johns on | Johnson | Johns on |
| 27 <br> E. Pruad Flerance $38+1$ | 69N | 38th | Johns on | Johns on | Johns on | Johnson |
|  | 69 P | 38th | Johns on | Johns on | Johns on | Johns on |
|  | 69R | 38 th | Johns on | Johns on | Johnson | Johns on |
|  | -70A | 38th | Johns on | Johns on | Johnson | Johns on |
|  | 70B | 38th | Johnson | Johnson | Johnson | Johns on |
|  | 71 | 38th | Johnson | Johnson | Johnson | Johnson |
| 28 | 72NA | 38th | Beach Jr. | Beach Jr. | Beach Jr. |  |
|  | 72 NB | 38th | Beach Jr. | Beach Jr. | Beach Jr, | Beach Sr. |
|  | 72 PA | 38th | Beach Jr. | Beach Jr. | Beach Jr. | Beach Sr. |
|  | 72 PB | 38th | Beach Jr. | Beach Jr. | Beach Jr. | Beach Sr. |
|  | 73A | Hodge | Beach Jr. | Beach Jr. | Beach Jr. | Beach Sr. |
|  | 73B | DeRenne | Beach Jr. | Beach Jr. | Beach Jr. | Beach Sr. |
|  | 74A | DeRerne | Beach Jr. | Beach Jr. | Beach Jr. | Beach Sr. |
|  | 74 BA | 38th | Beach Jr. | Beach Jr. | Beach Jr. | Beach Sr. |
|  | 74 BB 74 C | 38th | Beach Jr. | Beach Jr. | Beach Sr. | Beach Sr. |
|  | 74 C | 38th | Beach Jr. | Beach Jr. | Beach $\mathrm{S}_{\text {r }}$. | Beach Sr. |
| 29 | 75 | 38th | Johnson | Johns on | Johnson | Johns on |
|  | 76 | 38th | Johnson | Johnson | Johns on | Johnson |
|  | 77A | 38th | Johns on | Johns on | Johns on | Johns on |
|  | 77B | 38th | Johns on | Johns on | Johns on | Johns on |
|  | 78A | 38th | Johns on | Johns on | Johnson | Johns on |
|  | 78.3 | 38th | Johns on | Johns on | Johnson | Johns on |
| 30 | 79 | 38th | Johnson | Johnson | Johnson |  |
|  | 80 | 38th | Johnson | Johns on | Johns on | Johns on |
|  | 81 | 38th | Johnson | Johns on | Johns on | Johns on |
| 32 | 82A | Jacks on (1-5) Tompkins (6) | Scott $\mathrm{J}_{\text {r }}$. | Tompieis Sr. | Tompkins Sr | Tompkins Sr. |
|  | 82B | Bartow | Scott Jr. | Tompkins Sr. | Tompans $\mathrm{S}_{7}$. | Tompkins Sr. |
|  | 83 N | Bartow | Scott Jr. | Tompkins Sr. | Tompkins Sr 。 | Tompkins $\mathrm{S}_{\mathrm{r}}$. |
|  | 83P | Bartow | Scott Jr. | Tompkins Sr. | Tompkins Sr. | Tompkins Sr. |
| 33$+\quad$ | 84 85 | P. Smith P. Smith | Cuyler | Scott Jr. Scott Jr. | Scott $\mathrm{Jr}^{\text {r }}$. Scott r | Tompkins Sx. Tompkins Sr. |
|  | 86-87 | Butler | Beach Jx. | Beach Jr. | Beach Sx. | Beach Sr . |
| 34 | 88 | 38th | Johnson | Johnson | Johns on | Johnson |
|  | 89 | 38th | Johnson | Johnson | Johnson | Johns on |
|  | 90A | 38th | Johnson | Johns on | Johns on | Johnson |
|  | 90B | 38th | Johnson | Johns on | Johns on | Johnson |
|  | 91A | 38th | Johnson | Johnson | Johnson | Johns on |
|  | 91B | 38th | Johns on | Johns on | Johnson | Johns on |
|  | 92 | 38th | Johnson | Johns on | Johns on | Johns on |
|  | 93A | 38th | Johnson | Johnson | Johnson | Johnson |
|  | 93B | 38th | Beach Jr. | Beach Jr. | Beach Sr. | Beach Sr. |
|  | 94A | 38th | Seach Jr. | Beach Jr. | Beach Sr. | Beach Sr. |
|  | 94 B | Haven | Beach Jr. | Beach Jr. | Beach Sr. | Beach Sr. |
|  | 94CA | Haven | Beach Jr. | Beach Jr. | Beach Sr. | Beach Sr. |
|  | 94 CB | Haven | Beach Jr. | Beach Jr. | Beach Sr. | Beach Sr. |


| CT |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| CC | ED | $i-6$ | 7 | 8 | 9 | 10-11-12 |  |
| $35 \mathrm{~A}$ | 95 | Spencer | Johnson | Johnson | Johns on | Johns on |  |
|  | 96NA | Spencer | Johnson | Johnson | Johns on | Johns on |  |
|  | 96 NB | Spencer | Johnson | Johns on | Johns on | Johns on |  |
|  | 96PA | Spencer--Vorrorr | Johnson | Johnson | Johns on | Johns on |  |
|  | 96 PB | Spencer | Johnson | Johns on | Johns on | Johns on |  |
| 35B | 97A | Johnson | Johns on | Johns on | Johns on | Johns on |  |
|  | 97 BA | Johnson | Johnson | Johnson | Johns on | Johns on |  |
|  | 97 BB | Johnson | Johnson | Johns on | Johnson | Johnson |  |
|  | 97 C | Johns on | Johns on | Johns on | Johns on | Johnson |  |
|  | 98 P | Johns on | Johns on | Johnson | Johnson | Johns on |  |
|  | 99 | Johnson | Johns on | Johnson | Johnson | Johns on |  |
| 36A | 100N | Spencer | Johns on | Johns on | Johnson | Johnson |  |
|  | 100 P | Spencer | Johns on | Johnson | Johnson | Johnson |  |
|  | 101A | Spencer | Johns on | Johns on | Johns on | Johnson |  |
|  | 101B | Spencer | Johns on | Johnson | Johns on | Johnson |  |
|  | 102A | Spencer | Johns on | Johns on | Johns on | Johnson |  |
|  | 102 B | Spencer | Johns on | Johns on | Johns on | Johns on |  |
|  | 103INA | Spencer | Johns on | Johnson | Johnson | Johnson |  |
|  | 103 NB | Spencer | Johnson | Johns on | Johnson | Johns on |  |
|  | 103NC | Spencer | Johnson | Johnson | Johns on | Johns on |  |
|  | 103P | Spencer | Johnson | Johnson | Johns on | Johns on |  |
|  | 104 | Spencer | Johnson | Johnson | Johnson | Johns on |  |
| 368 | 105NA | Spencer | J ohns on | Johns on | Johns on | Johns on |  |
|  | 105 NB | Spencer | Johns on | Johns on | Johns on | Johns on |  |
|  | 105P | Spencer | Johns on | Johns on | Johns on | Johns on |  |
|  | 106NA | Spencer | Johns on | Johnson | Johns on | Johns on |  |
|  | 106NB | Spencer | Johns on | Johnson | Johns on | Johns on |  |
|  | 106PA | Spencer | Johnson | Johns on | Johns on | Johns on |  |
|  | 106PB | Spencer | Johns on | Johns on | Johns on | Johns on |  |
|  | 107A | Spencer | Johnson | Johns on | Johns on | Johns on |  |
|  | 107B | Spencer | Johns on | Johns on | Johns on | Johnson |  |
|  | 108A | Johns on | Johns on | Johns on | Johns on | Johns on |  |
|  | 108B | Johns on | Johns on | Johns on | Johnson | Johns on |  |
|  | 108C | Johns on | Johns on | Johns on | Johnsoun | Johnson |  |
| 37 | 109A | Spencer | Johns on | Johns on | Johnson | Johnson |  |
|  | 109B | Spencer | Johnson | Johns on | Johnson | Johns on |  |
|  | 109 C | Spencer | Johns on | Johns on | Johnson | Johns on |  |
|  | 110 N | Spencer | Johnson | Johns on | Johns on | Johns on |  |
|  | 110 P | Spencer | Johns on | Johnson | Johns on | Johns on |  |


| CT |  | GRADES |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| CC | ED | 1-6 | 7 | 8 | 9 | 10-11-12 |
| 38 | 111N | Johnson | Johnson | Johnson | Johnson | Johnson |
|  | 111PA | Johnson | Johns on | Johns on | Johnson | Johns on |
|  | 111PB | Johnson | Johnson | Johnson | Johnson | Johnson |
| 39 | 112A | Johns on | Johnson | Johns on | Johns on | Johnson |
|  | 112B | Johnson | Johnson | Johns on | Johnson | Johnson |
|  | 112 C | Johnson | Johns on | Johns on | Johnson | Johnson |
|  | 112 DA | Johnson | Johnson | Johns on | Johnson | Johns on |
|  | 112DB | Johnson | Johnson | Johns on | Johns on | Johns on |
| 40 | 113 | Johns on | Johns on | Johnson | Johns on | Johns on |
|  | 114.A | Johnson | Johnson | Johns on | Johns on | Johns on |
|  | 114B | Johnson | Johns on | Johns on | Johnson | Johns on |
|  | 114C | Johnson | Johnson | Johns on | Johns on | Johnson |
|  | 114D | Johns on | Johnson | Johnson | Johnson | Johnson |
|  | 115 | Johnson | Johnson | Johnson | Johns on | Johnson |
|  | 116A | Johnson | Johns on | Johnson | Johnson | Johnson |
|  | 116 BA | Johns on | Johnson | Johns on | Johnson | Johnson |
|  | 116 BB | Haven | Johnson | Johnson | Johns on | Johnson |
|  | 116C | Haven | Johns on | Johns on | Johns on | Johnson |
|  | 117A | Johnson | Johns on | Johns on | Johnson | Johns on |
|  | 117BA | Johnson | Johnson | Johns on | Johnson | Johns on |
|  | 117BB | Johnson | Johnson | Johns on | Johnson | Johns on |
|  | 117C | Johns on | Johns on | Johnson | Johns on | Johns on |
|  | 117DA | Johnson | Johnson | Johns on | Johnson | Johns on |
|  | 117DB | Johnson | Johns on | Johns on | Johns on | Johnson |
|  | 117EA | Johns on | Johns on | Johnson | Johns on | Johns on |
|  | 117EB | Johnson | Johnson | Johnson | Johnson | Johns on |
|  | 117F | Johns on | Johns on | Johnson | Johns on | Johnson |
| 41 | 118NA | Johnson | Johnson | Johns on | Johns on | Johns on |
|  | 118 NB | Johnson | Jolinson | Johnson | Johns on | Johns on |
|  | 118PA | Haven | Johnson | Johnson | Johnson | Johns on |
|  | 118 PB | Haven | Johns on | Johns on | Johns on | Johnson |
|  | 118PCA | Haven | Johns on | Johns on | Johnson | Johnson |
|  | 118PCB | Haven | Johns on | Johnson | Johns on | Johnson |
|  | 118PD | Haven | Johns on | Johns on | Johnson | Johns on |
|  | 118 PE 118 PF | Haven Haven | Johnson Johnson | Johns on Johns on | Johns on Johnson | Johns on Johns on |
|  | 118PF | Haven | johns on |  |  |  |
| 43 | 119- | Haven | Johns on | Johns on | Johnson | Johnson |
|  | 120 S |  |  |  |  |  |
| 44 | 121A | Haven | Beach Jr. | Beach JT. | Beach Sr. | Beach Sr. |
|  | 121B | Haven | Beach Jr. | Beach Jr. | Beach Sr. | Beach Sr. |
|  | 121C | Haven | Beach Jr. | Beach Jr. | Beach Sr. | Beach Sr. |
| 101 | 1 N | Spencer | Johnson | Johnson | Johns on | Johns on |
|  | 1 P | Spencer | Johns on | Johnson | Johns on | Johns on |
|  | 1R-1S | Spencer | Johnson | Johns on | Johns on | Johns on |
|  | 17 | Spencer | Johns on | Johns on | Johns on | Johns on |
|  | 1 U | Johnson | Johns on | Johnson | Johns on | Johnson |
|  | 1W-1X | Johnson | Johns on | Johns on | Johns on | Johns on |
|  | 2 | Johns on | Johns on | Johnson | Johns on | Johns on |
|  | 4 N | Johns on | Johnson | Johnson | Johns on | Johns on |
|  | 4 PA | Johns on | Johnson | Johns on | Johns on | Johns on |
|  | 4 PB | Johnson | Johnson | Johnson | Johns on | Johns,on |
|  | 45 | Johne on | Johns on | Johns on | Johnson | Johnson |
|  |  |  | D | 7 |  |  |


| or |  | GRADES |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| CC | $E D$ | 1-6 | 7 | 8 | 9 | 10-11-12 |
| 102 | 4 R | Johns on | Johnson | Johnson | Johns on | Johnson |
| 105 | 15 N | Haven | Beach Jr. | Beach Jr. | Beach Jr. | Tompkins Sr. |
|  | 15P | DeRenne | Beach Jr. | Beach Jr. | Beach Jr. | Beach Sr. |
|  | 16NA | DeRenne | Beach Jr. | Beach Jr. | Beach Jr. | Beach Sr. |
|  | 16NB | DeRenne | Beach Jr. | Beach Jr. | Beach Jr. | Beach Sr. |
|  | 16NC | Hodge | Beach Jr. | Beach Jr. | Beach Jr. | Beach Sr. |
|  | 16ND | Butler | Beach Jr. | Beach Jr. | Beach Jr. | Beach Sr. |
|  | 16 P | DeRenne | Beach Jr. | Beach Jr. | Beach Jr, | Beach Sr. |
|  | 17 NA | Haven | Scott Jr. | Scott Jr. | Scott Jr. | Tompkins Sr. |
|  | 17 NB | Haven | Scott Jr. | Scott Jr. | Scott Jr. | Tompkins Sr. |
|  | 17 P | Haven | Scott Jr. | Scott Jr. | Scott Jr. | Tompkins Sr. |
|  | 17RA | Haven | Scott Jr. | Scott Jr. | Scott Jr. | Tompkins Sr. |
|  | 17 RB | Haven | Scott Jr. | Scott Jr. | Scott Jr. | Tompkins Sx. |
|  | 17 S | Haven | Scott Jr. | Scott Jr. | Scott Jr. | Tompkins Sr. |
|  | 18 N | Butler | Beach Jr. | Beach Jr. | Beach Sr. | Beach Sr. |
|  | 18 P | Butler | Beach Jr. | Beach Jr. | Beach Jr. | Beach Sr. |
|  | 18RA | Butler | Scott Jr. | Scott Jr. | Scott Jr. | Tompkins Sr. |
|  | 18 RB | Butler | Scott Jr. | Scott Jr. | Scott Jr. | Tompkins Sr. |
|  | 19 N | Tompkins | Scott Jr. | Scott Jr. | Scott Jr. | Tompkins Sr. |
|  | 42A | Butler | Scott Jr. | Scott Jr. | Scott Jr. | Tompkins Sr. |
|  | 42B | Tompkins | Scott Jr. | Scott Jr. | Scott Jr. | Tompkins Sr. |
| 106 | 19 P | Tompkins | Scott Jr. | Scott $J^{\text {r }}$. | Scott Jr. | Tompkins Sr. |
|  | 19R | Tompkins | Scott Jr. | Scott Jr. | Scott Jr. | Tompkins Sr. |
|  | 20 | Haynes | Scott Jr. | Scott Jr. | Scott Jr. | Tompkins Sr. |
|  | 21 N | Haynes | Scotc Jr. | Scott Jr. | Scott Jr. | Tompkins Sr. |
|  | $21 P$ | Haynes | Scott Jr. | Scott Jr. | Scott Jr. | Tompkins Sr. |
|  | $21 R$ | Haynes | Scott Jr. | Scott Jr. | Scott Jr. | Tompkins Sr. |
|  | 215 | Haynes | Scott Jr. | Scott Jr. | Scott Jr. | Tompkins Sr. |
|  | 21 T | Haynes | Scott Jr. | Scott Jr. | Scott Jr. | Tompkins Sr. |
|  | 22 A | Haynes | Scott Jr. | Scott Jr. | Scott JI. | Tompkins Sr, |
|  | 22B | Haynes | $5 \operatorname{cott} \mathrm{Jr}$. | Scott Jr. | Scott Jr. | Tompkins $\mathrm{S}_{\text {r }}$. |
|  | 22 C | Haynes | Scott Jr. | Scott Jr. | Scott Jr. | Tompkins Sr. |
|  | 23A | Haynes | Scott Jr. | Scott Jr. | Scott Jr. | Tompkins Sr. |
|  | 23B | Haynes | Scott Jr. | Scott Jr. | Scott Jr. | Tompkins Sr. |
|  | 24A | Haynes | Scott Jr. | Scott Jr. | Scott Jr. | Tompkins Sr. |
|  | 24B | Haynes | Scott Jr. | Scott Jr. | Scott Jr. | Tompkins Sr. |
|  | 25 | Haynes | Scott Jr. | Scott Jr. | Scott Jr. | Tompkins Sr. |
|  | 26 | Haynes | Scott $J^{\text {r }}$. | Scott Jr. | Scott Jr. | Tompkins Sr. |
|  | 27 NA | Haynes | Scott Jr. | Scott Jr. | Scott Jr. | Tompkins Sr. |
|  | 27 NB | Tompkins | 5 cott Jr. | Scott Jr. | Scott Jr. | Tompkins Sr. |
|  | 27 P | Bartow | Scott Jr. | Scott Jr. | Scott Jr. | Tompkins Sr. |
|  | R-S.T | Tompkins | Scott Jr. | Scott Jr. | Scott Jr. | Tompkins Sr. |
|  | U | Haynes | Scott Jr. | Scott Jr. | Scott Jr. | Tompkins Sr . |
| 107 | 27W | Tompkins | Scott Jr. | Scott Jr. | Scott Jr. | Tompkins $S_{r}$. Tompkins Sr |
|  | 27 X | Tompkins | Scott Jr. | Scott Jr. |  | Tompkins $\mathrm{Sr}_{\mathrm{r}}$. Tompkins Sr . |
|  | 27 Y | Tompkins | Scott Jr. | Scott Jr. | Scott Jr. | Tompkins Sr, Tompkins $\mathrm{S}_{\mathrm{r}}$. |
|  | 28N | Tompkins | Scott Jr. | Scott Jr. | Scott Jr. | Tompkins Sr. |
|  | 28P | Tompkins | Scott Jr. | Scott Jr. | Scott Jr. Scott Jr. | Tompkins $\mathrm{Sr}_{\text {r }}$ Tompkins Sr . |
|  | 28 S | Tompkins | Scott Jr. | Scott Jr. | Scott Jr. | Tompkins Sr. |
|  | 28 T | Tompkins | Scott Jr. | Scott Jr. | Scott Jr. | Tompkins Sr. |
|  | 28UA | Tompkins | Scott Jr. | Scott Jr. | Scott Jr. | Tompkins Sr. |
|  | 28 UB | Tompkins | Scott Jr. | Scott Jr. | Scott Jr. | Tompkins Sr. |
|  | 28W | Tompkins | Scott Jr. | Scott Jr. | Scott Jr. | Tompkins Sr |
|  | 1 | Tompkins | Scott Jr. | Scott Jr, | Scott Jr. | Tompkins Sr. |
|  | 2AA | Tompkins | Scott Jr. | Scott Jr. <br> Scott Jr. | Scott Jr. <br> Scott Jr. | Tompkins Sr |
|  | 2 AB | Tompkins | Scott Jr. | Scott Jr. | Scott Jr. | Tompkins Sr. |



ENUMERATION DISTRICTS AND
DESEGREGTION ATTEADITCE ARES

| ED | Elementary <br> Desegregation sittendance $\qquad$ Area | Secondiary Desegregation Attendance Area | EI | Elementary Desegregation Attenclance Area. | Secondary Desegregation Attendance area |
| :---: | :---: | :---: | :---: | :---: | :---: |
| IN | 1 | J. | 29 A | 1 | 2. |
| IP | 1 | 1 | 293 | 1 | 2 |
| 2 | 1 | 1 | 301 A | 1 | 2 |
| 3 H | 1 | 2 | 30178 | 1 | 2 |
| 3 P | $\underline{1}$ | 2 | 309A | 1 | 2 |
| 3 k | 1. | 2 | 30 PB | 1. | 2 |
| 4 | 1 | 2 | 3012 | 1 | 2 |
| 4 P | 1 | 2 | 31.1 | 1 | 2 |
| 5 | 1 | 2. | 31.3 | 1 | 2 |
| 6 | 1 | 2 | 32 | 1 | 2 |
| 7 | 1 | 2 | 334 | 1 | 2 |
| 9 | 1 | 2 | 331 | 1 | ? |
| 1.0 | 1 | 2 | 34 | 1 | 2 |
| 1.1 | 1 | 2 | 35 | 1 | 2 |
| 12 | 1. | 1 | $36 \%$ | 1. | ? |
| 13 | 1 | 1 | 36B | 1. | 2 |
| 1494 | 1 | 1 | 37 | 1 | 2 |
| 1420 | 1 | 1 | 38 | 1 | 2 |
| 143 | 1. | 1 | 39 A | 1 | 2 |
| 15 | 1. | 1 | 39B | 1 | 2 |
| 16 | 3. | 1 | 40 Ac | 1 | 2 |
| 17 NA | I | 1 | 40 B | 1 | 2 |
| 17 mba | 1 | 2 | 41 | 1 | 2 |
| 17 IBB | 1 | 2 | $1 \cdot 2 \mathrm{~A}$. | 1 | - |
| 17P | 1. | 1 | 42 B | 1 | 2 |
| 18 | 1. | 2 | 4.20 | 1 | 2 |
| 19 | 1 | 2 | 4:3A | 1 | 2 |
| 2.0 | 1 | 2 | 4:3B | 1 | 2 |
| 21 | 1 | 2 | 4.4is | 1. | 2 |
| 22 | 1. | 2 | 4,4:3 | 1 | 2 |
| 23 | 1 | 2 | 45A | 1 | 2 |
| 24 | 1 | 2 | $45 B$ | 1 | 2 |
| 25 | 1 | 2 | 4:6iA | 1 | 2 |
| 26 | 3 | 2 | $46: B$ | 1. | 2 |
| 27 3 | 1 | 2 | 46 BA | 1 | 2 |
| 27PA | 1 | 2 | 46 BH | 1 | 2 |
| 27 PE | 1 | 2 | 4.7A | 1 | 2 |
| 27RA | 1 | 2 | 47 E | 1 | 2. |
| 27RB | 1 | 2. | $43 A$ | 1 | 2 |
| 28 | 1 | 2 | 48 MA | 1 | 2 |


| ED | Elementary Desegregatjon Attendance Area | Secondary Desegregation Attendance Area $\qquad$ | ED | Elementary Desegregation Attendance Area | Secondary Desegregation Attendance $\qquad$ Area |
| :---: | :---: | :---: | :---: | :---: | :---: |
|  |  |  |  | 1 | 2 |
| 48BB | 1 | 2 | 70 B | 1 | 2 |
| 49 A | 1 | 2 | 70 B | 1 | 2 |
| 49B | 1 | 2 | 72 NA | 2 | 2 |
| 49 CA | 1 | 2 | 72 NA | 2 | 2 |
| 49 CB | 1 | 2 | 72 NB | 2 | 2 |
| 49 D | 1 | 2 | 72 PA | 2 | 2 |
| 50 | 1 | 2 | 72 PB | 2 | 2 |
| 51 A | 1 | 2 | 73 A | 2 | 2 |
| 52 N | 1. | 2 | 73 B | 2 | 2 |
| 52 PA | 1 | 2 | 74 A | 2 | 2 |
| 52 PB | 1 | 2 | 74 BA | 2 | 2 |
| 53 | 1 | 2 | 74 BB | 2 | 2 |
| 54 A | 1 | 2 | 74 C 75 | 2 | 2 |
| 54 B | 1 | 2 | 75 | 2 | 2 |
| 55 A | 1 | 2 | 76 | 2 | 2 |
| 5513 | 1 | 2 | 77 A | 2 | 2 |
| 55 C | 1 | 2 | 77B | 2 | 2 |
| 56A | 1 | 2 | 78A | 2 | 2 |
| 56 B | 1 | 2 | 78 B | 2 | 2 |
| 56 C | 1 | 2 | 79 80 | 2 | 2 |
| 57 A | 1 | 2 | 80 | 2 | 2 |
| 5718 | 1 | 2 | 81 | 2 | 1 |
| 57 C | 1 | 2 | 82A | 1 | 1 |
| 571 | 1 | 2 | 82 B | 1. | 1 |
| 57 E | 1 | 2 | 83 N 832 | I | 1 |
| 5.8A | 1 | 2 | 831 84 | 1. | 1 |
| 5SB | 1 | 2 | 84 | 1 | 1 |
| 59 N | 1 | 2 | 85 | 71 | 2 |
| 59 P | 1 | 2 | 86-87 | 7 | 2 |
| 60 A | 1. | 2 | 88 | 2 | 2 |
| 60 B | 1. | 2 | 89 | 2 | 2 |
| 61 A | 1 | 2 | 90 A | 2 | 2 |
| $61 . \mathrm{B}$ | 1 | 2 | 90 B | 2 | 2 |
| 62A | 1 | 2 | 91A | 2 | 2 |
| 62 B | 1 | 2 | 91 B | 2 | 2 |
| 63 | 1 | 2 | 92 | 2 | - 2 |
| 64 | 1 | 2 | 93 A | 2 | 2 |
| 65 N | 1 | 2 | 93 B | 2 | 2 |
| 65 P | 1 | 2 | 94 A | 2 | 2 |
| 65 RA | 1 | 2. | 94 B | 2 | 2 |
| 65 R 3 | 1 | 2 | 94 CA | 2 | 2 |
| 655 | 1 | 2 | $94 . \mathrm{CB}$ | 2 | 2 |
| 66A | 1 | 2 | 95 | 2 | 2 |
| 66 B | 1 | 2 | 96 NA | - 2 | 2 |
| 67 N | 1 | 2 | 96 NB | - 2 | 2 |
| 67 P | 1. | 2 | 96 PA | 2 | 2 |
| 67R | 1 | 2 | 95 PB | - 2 | 2 |
| 68A | 1 | 2 | 97 A | 2 | 3 |
| 68B | 1 | 2 | 97 BA | - 2 | 3 |
| 69 N | 1 | 2 | 97 BB | - 2 | 3 |
| 69 p | 1 | 2 | 97 C | 2 | 3 |
| 69R | 1 | 2 | 98 P | 2 | 3 |


| ED | Elementary Desegregation Attendance Area | Secondary <br> Desegregation Attencance Area | ED Des | mentary gregation ndance Area | Seconclary <br> Desegregation <br> Attendance. <br> Area |
| :---: | :---: | :---: | :---: | :---: | :---: |
| 99 | 2 | 3 | 117 DA | 3 | 3 |
| 100 N | 1 | 2 | 117 DB | 3 | 3 |
| 100p | 1 | 2 | 117 EA | 3 | 3 |
| 101A | 1 | 2 | 117EB | 3 | 3 |
| 1013 | 1 | 2 | 117 F | 3 | 3 |
| 102A | 1. | 2 | 118 NA | 3 | 3 |
| 3.02B | 1 | 2 | 118 NB | 3 | 3 |
| 103 NA | 1 | 2 | 118 PA | 3 | 3 |
| 103 NB | 1 | 2 | 1.18 PB | 3 | 3 |
| 103 NC | 1 | 2 | 1.1 .8 PCA | 3 | 3 |
| 103P | 1 | 2 | 11 SPCB | 3 | 3 |
| 104 | 1 | 2 | 118 PD | 3 | 3 |
| 105 NA | 1 | 2 | 11.8 PE | 3 | 3 |
| 105 NB | 1. | 2 | 118 PF | 3 | 3 |
| 1.05 P | 1 | 2 | 119- | 2 | 3 |
| 106 NA | 1 | 2 | 1205 |  |  |
| 105 NB | 1. | 2 | 121.A | 2 | 2 |
| 106 PA | 1. | 2 | 121 B | 2 | 2 |
| 106 PB | 1 | 2 | 121 C | 2 | 2 |
| 107 A | 1 | 2 | 1 N | 1 | 2 |
| 107 B | $i$ | 3 | 1 P | 1 | 2 |
| 1.08A | 1 | 3 | 1R-S-T | 1 | 2 |
| 108 B | 1 | 3 | 1 U | 1 | 2 |
| 1086 | 1 | 3 | 1.W | 1 | 3 |
| 109A | 1 | 2 | 1 Y | 2 | 3 |
| 109 B | 1 | 2 | 2 | 2 | 3 |
| 109 C | 1 | 2 | 4 N | 2 | 3 |
| 110 N | 1 | 2. | 4 PA | 2 | 3 |
| 110P | 1 | 2 | $4 \mathrm{P} \mathrm{B}^{\text {a }}$ | 3 | 3 |
| 111 N | 2 | 3 | 4 S | 2 | 3 |
| 111 PA | 2 | 3 | 4 R | 3 | 3 |
| 111 PI | 2 | 3 | 15 N | 2 | 3 |
| 1.1.2A | 3 | 3 | 15 P | 2 | 2 |
| 112 B | 3 | 3 | 1.6 NA | 2 | 2 |
| 1120 | 2 | 3 | 16 NB | 2 | 2 |
| 112 DA | 3 | 3 | 16 NC | 2 | 2 |
| 112 DB | 3 | 3 | 16 P | 2 | 2 |
| 113 | 3 | 3 | 17NA | 4 | 1 |
| 114 A | 3 | 3 | 17 NB | 4 | 1 |
| 114 B | 3 | 3 | 17 P | 4 | 1 |
| 114 C | 3 | 3 | 17RA | 4 | 1 |
| 114 D | 3 | 3 | 17 RB | 4 |  |
| 11.5 | 3 | 3 | 17 S | 4 | 1. |
| 116A | 3 | 3 | 18 N | 4 | 2 |
| 116BA | 3 | 3 | 18 P | 1 | 2 |
| 116 BB | 2 | 3 | 18 RA | 4 | 1 |
| 11.6 C | 3 | 3 | 18 RB | 4 | 1 |
| 117 A | 3 | 3 | 1.9 N | 4 | 1 |
| 117 BA | 3 | 3 | 42A | 4 | 1 |
| 117 BB | 3 | 3 | 42 B | 4 | 1 |
| 1170 | 3 | 3 | 19 P | 4 | 1 |


| ED | Elementary Desegregation Attendance Area | Secondary Desegregation Attendance Area | ED | Elementary Desegregation Attendance Area | Secondary Desegregation Attendance. Area |
| :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | 1 | 38CA | 4 | 1 |
| 19R | 4 | 1 | 38 CB | 4 | 1 |
| 21N | 4 | 1 | 38D | 4 | 1 |
| 21 P | 4 | 1. | 39A | 4 | 1 |
| 21 R | 4 | 1 | 39 B | 4 | 1 |
| 21 S | 4 | 1 | 40 | 4 | 1 |
| 2]T | 4 | 1 | 41 A | 4 | 1 |
| 22A | 4 | 1 | 413 | 4 | 1 |
| 22B | 4 | 1. | 41 C | 4 | 3 |
| 22 C | 4 | 1 | 35PA | 3 | 3 |
| 23 A | 4 | 3 | 35 PJ | 3 | 3 |
| 23 B | 4 | 1 | 35SA | 3 | 3 |
| 24 A | 4 | 1 | 35 SB | 3 | 3 |
| 24 B | 4 | 1 | 4 T | 3 | 3 |
| 25 | 4 | 1 | 6 N | 3 | 3 |
| 26 | 4 | 1 | 6 P | 3 | 3 |
| 27 NA | 4 | 1 | 7A | 3 | 3 |
| 27 NB | 4 | 1 | 7 B | 3 | 3 3 |
| 27 P | 1 | 1 | 7 C | 5 | 3 |
| 27R | 1 | 2 | 34 A | 3 | 3 |
| $27 \mathrm{~S}-\mathrm{T}$ | 1 | 1 | 34 BA | 3 | 3 |
| 27U | 1 | 1 | 34 BB | 3 | 3 |
| 27W | 4 | 1 | 34 CA | 3 | 3 |
| 27X | 4 | 1 | 34 CB | 3 | 3 |
| 27 Y | 4 | 1 | 35N | 3 | 3 |
| 28N | 4 | 1 | 30-31 | 1.5 | 3 |
| 281 | 4 | 1 | 31PA | 5 | 3 |
| 288. | 4 | 1 | 31 PB | 5 | 3 |
| 285 | 4 | 1 | 32 | 5 | 3 |
| 28 T | 4 | 1 | 33 | 5 | 3 |
| 28UA | 4 | 1 |  |  |  |
| 28UB | 4 | 1 |  |  |  |
| 28.1 | 4 | 1 |  |  |  |
| 1 | 4 | 1 |  |  |  |
| 2 AA | 4 | 1 |  |  |  |
| 2 AB | 4 | 1 |  |  |  |
| 2B | 4 | 1 |  |  |  |
| 3 | 4 | 1 |  |  |  |
| 38A | 4 | 1 |  |  |  |
| 38B | 4 | 1 |  |  |  |

## SUMMARY OF EXHTBIT \#41

APPLICATIONS 1965 ACCEPTED-WITHDRAWN

| Student | $\qquad$ | $\begin{aligned} & \text { School Returned } \\ & \text { To in } 1965 \\ & \hline \end{aligned}$ | Date of Application to Withcraw | Form of Application to Withdraw | Reason Given to Withdrary |
| :---: | :---: | :---: | :---: | :---: | :---: |
| Mildred McClain | Savannah High | Beach High | 10/22/65 | Letter | Chanzing residence and transportation will be a problem. |
| Clara Mae Gillison | Savannah High | Beach High | 8/20/65 | Letter | Impossible to provide transportation to Savannah High. |
| Connie Marie Bisard | Jenkins High | Johnson High | 8/23/65 | Letter | Lack of Transportation. |
| Bobbie Jean Walker | Jenkins High | Johnson High | 9/1/65 | Letter | Impossible to provide Transportation. |
| Vivian Nesbitt | Chatham Jr. | Beach Jr. | 9/1/65 | Letter | Transportation cost. |
| Jacqueline <br> Louise Hall | Mercer Jr. | Scott Jr. | 8/31/65 | Letter | Contrary to her understanding transportation was not provided. |
| Joyce Brown | Mercer Jr. | Scott Jr. | 8/30/65 | Letter | Lack of transportation. |

School Transferred
Student

School Returned -To in 1965

Date of Ap plicatjon to withcraw
Johnson Elementary 10/17/05

Johnson Elementary 20/2.7/65
Johnson Elementary 10/27/65

Johnson High
Tompkins High

Beach Junior

Johnson Junior

Johnson High

Hubert Elementary
$8 / 17 / 65$

Form of Ap-

Letter No reason given.

Letter No reasor given.

Telephone No reason given.

No reason given.
Letter

## 4

plication to wijthdraw

Letter Transportation cost.

Letter Lack of Transportation. tion.

No reason giver.

No reason given.

## Reason Given

 to Withdraw
## Letter Lack of Transporta-

| Student | $\begin{gathered} \text { School Transferred } \\ \text { To in } 1965 \\ \hline \end{gathered}$ | $\begin{gathered} \text { School Returned } \\ \text { To in } 1965 \\ \hline \end{gathered}$ | Date of Ap plication to Withdraw | Form of Appiication to Witndraw | Reason Given to Withdraw |
| :---: | :---: | :---: | :---: | :---: | :---: |
| Patricia Diggs | Riley Elementary | Hubert Elementary | 8/17/65 | Letter | No reason given. |
| Nathaniel <br> Reed | Groves High | Beach High | 5/31/65 | Telephone | No reason given. |
| Joan A. Spann | Riley Elementary | Hubert Elementary | 8/17/65 | Letter | No reason given. |
| Pearl Balcom | Windsor Forest Elem. | Haven Elementary | 7/26/65 | Letter | No reason given. |
| James Balcom | Windsor Forest Elem. | Haven Elementary | 7/26/65 | Letter | No reason given. |
| Vivian Smith | Savannah High | Beach High | 6/14/65 | Letter | Harassment by students. |
| James Sterling Bryant | Mercer Junior | Tompkins Junior | 6/14/65 | Telephone | Lack of special education class |
| Fredrick <br> Michael Grant | Groves High | Tompkins High | $\begin{aligned} & 7 / 14 / 65 \\ & 7 / 21 / 65 \end{aligned}$ | Letter from student Telephone | Promise of scholarship. |
| Martin Lee Grant | Groves Hiigh | Tompkins High | $\begin{aligned} & 7 / 14 / 65 \\ & 7 / 21 / 65 \end{aligned}$ | Letter from student Telephone | Promise of scholarship. |


| Student | School Transferred $\qquad$ To in 1965 | School. Returned To in 1965 | Date of Application to Withdraw | Fomil of $\mathrm{Ap}-$ plication to Withdraw | Reason Given to Withdraw |
| :---: | :---: | :---: | :---: | :---: | :---: |
| Samuel Thomas Grant | Jenkins High | Johnson High | 6/9/65 | Letter | Enviornment situation. |
| patricia <br> Ann <br> Wingster | Jenkins Hişh | Johinson High | 9/10/65 | Letter | Enviornment situation. |
| Harriet Framble | Jenkins High | Johnson liigh | $\begin{aligned} & 9 / 12 / 65 \\ & 9 / 16 / 65 \end{aligned}$ | Lettex Teiephone | Enviornmental situation |
| Argnes <br> Mitchell | Groves High | Tompkins High | $\begin{aligned} & 3 / 25 / 65 \\ & 8 / 23 / 65 \end{aligned}$ | Letter from student Unknown | Letter from student; distance to Groves, and mother's desires (She was officially informed $8 / 18$ that an official request from parent must be made.) Substance of parents request $8 / 23$ unknown - no letter in file. |
| Wenry Johnson | Savannah High | Johnson High | 8/31/65 | Letter | Son's behavior. |
| Worine Betty Johnson | Mercer Junior | Scott Junior | 7/16/65 | Letter | Parent did not desire transfer and did not sign form. |

Student

David
Clevel and
Grant III
Shirley Ann Jordan

Dlenda
Douglas

## Bessie Lee

 WaitharSchool Transfewred To in 1965

Savannah High

Savannah High

Jenkins

Savannah High

School Returned To in 1965

Beach Hiğn
Beach High
Perochial School

Out of County

Date of Ap-
plication
to Withdraw
$9 / 27 / 65$
$8 / 30 / 65$
$8 / 20 / 65$
$5 / 26 / 65$

Fomi of $\Lambda p-$
plication to Withdraw

Letter Medicai attention

Letter Only applied to Groves at Savannah.

Desire for parochial school.

Out of county,


[^0]:    1/ United Stetes Cersus of Populecion: 1960-General
    Pomiarion Characteristics. Geozta. Final Report DC(1)-12B.
    U. S. Department of Commerce (Washigton, D.C.: Government

    Printing Office, 1961), D. 12-75.

[^1]:    4/ Huber's district covers part of Shuman's distriot and part of Chatham's district.

[^2]:    * Enumeration District

[^3]:    5/ See Appendix E. Enumeration District 30 is in desegregation attendance area 3 . High school students residing in that area are assigned to Johnson but may transfer to Jenkins.

    6/ "Q Is there a bus from Savannah Beach to Jenkins?
    A No, they are not in the Jenkins area. Savannah Beach is not in the Jenkins area."

[^4]:    C-6

