

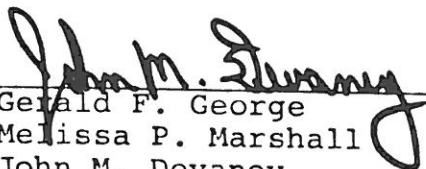
IN THE UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
v.)	C.A. NO. H-84-2949
)	
SPRING BRANCH INDEPENDENT)	
SCHOOL DISTRICT, et al.,)	
)	
Defendants.)	
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NOTICE OF DEPOSITION BY PLAINTIFF UNITED STATES

TO; JEFFREY A. DAVIS, ESQUIRE
Reynolds, Allen & Cook
3300 Allied Bank Plaza
Houston, Texas 77002

NOTICE IS HEREBY GIVEN that, pursuant to Rules 26 and 30, F.R. Civ. P., plaintiff United States, by and through its counsel, will take the deposition of Henry H. Wheeler, 201 Wilcrest Drive, Houston, Texas 77042 at Suite 540, 440 Louisiana, Houston, Texas 70002, commencing at 9:00 a.m. on January 30, 1987 and continuing until completed.


Gerald F. George
Melissa P. Marshall
John M. Devaney
Eugenia Esch
Attorneys
U.S. Department of Justice
Civil Rights Division
Washington, D. C.
(202) 633-4171

IN THE UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF TEXAS
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UNITED STATES OF AMERICA,)	
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Plaintiff,)	
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SPRING BRANCH INDEPENDENT)	
SCHOOL DISTRICT, et al.,)	
)	
Defendants.)	
_____)	

ATTACHMENT TO NOTICE OF DEPOSITION
OF HENRY H. WHEELER

The materials to be produced, pursuant to subpoena duces tecum, by Henry H. Wheeler, at the time of his deposition by plaintiff United States at Suite 540, 440 Louisiana, Houston, Texas 70002, commencing at 9:00 a.m. on January 30, 1987, are as follows:

Definitions

Unless a contrary meaning clearly applies in the context, the following definitions shall apply to this Notice:

1. "DOCUMENTS" refer to:

- (1) Any papers or writings of any kind, including but not limited to: records; files; folders; applications; correspondence; reports; studies; analyses; memoranda; letters, telegrams; calendars or diaries; minutes; pamphlets; notes; charts; tabulations; press releases; published books, articles, treatises or papers; photographs; accounting entries; accountant's work papers; receipts; vouchers; recording of minutes, conferences and telephone or other communications;
- (2) Any drafts of any DOCUMENTS as defined in Paragraph (1), above;
- (3) Any alterations, notes, comments or other material not included in the original of any DOCUMENTS as defined in Paragraph (1), above; and
- (4) The data base and all output, either in printed or machine-readable form, of any computerized data recording, storage, analyzation and retrieval system (e.g., tapes, punch cards, microfilm, printouts), as well as the written information necessary to understand and use such data base or output.

2. ALL DOCUMENTS reflecting schedules or calendars of interviews for TEACHING AND CLERICAL POSITIONS conducted at SBISD which indicate the race of the person(s) interviewed.

3. All schedules or other DOCUMENTS relating to interviews for TEACHING AND CLERICAL POSITIONS conducted outside of SBISD which indicate the race of the person(s) interviewed, including but not limited to summaries of the number of persons interviewed and their race.

4. All DOCUMENTS relating to SBISD's CURRENT AND FORMER employees in TEACHING AND CLERICAL POSITIONS including, but not limited to, DOCUMENTS which reflect each such employee's name, home and business address, home and business telephone numbers, race, national origin, date of birth, social security number, educational background, employment history (including any prior service with SBISD as a substitute and/or student teacher), date of application, employment qualifications, salary or wages, assignments, job classifications and pay grades, evaluations of job performance, and other information related to the terms and conditions of employment.

5. Official minutes and all other DOCUMENTS relating to regular or special meetings of the Board of Trustees of SBISD.

6. All DOCUMENTS containing information about the procedures and standards, criteria or factors CURRENTLY OR FORMERLY utilized by SBISD to recruit, hire, assign, transfer, compensate, evaluate, discipline, fail to renew the contract

of, or terminate persons for TEACHING AND CLERICAL POSITIONS, including but not limited to DOCUMENTS which set forth, explain or clarify:

a. SBISD's procedures for announcing or publicizing vacancies or otherwise recruiting applicants for TEACHING AND CLERICAL POSITIONS, including the organizations and institutions which SBISD contacts or has contacted in an effort to locate or solicit applicants;

b. the procedure by which persons obtain and complete applications for TEACHING AND CLERICAL POSITIONS;

c. the process by which SBISD selects persons for hire, or assigns persons already hired, to various TEACHING POSITIONS, areas, fields and/or grade levels and various CLERICAL POSITIONS;

d. the standards, qualifications, criteria and other factors, including state certification and/or written employment tests, used by SBISD to recruit and select persons for hire for TEACHING AND CLERICAL POSITIONS, and the weight given the factors identified;

e. the process by which persons transfer from one TEACHING OR CLERICAL POSITION into another;

f. the standards, qualifications, criteria and other factors, including state certification and/or written employment tests, used by SBISD to assign or transfer persons already hired to various TEACHING

POSITIONS, areas, fields and/or grade levels and various CLERICAL POSITIONS, and the weight given the factors identified;

g. the identity and job titles of all CURRENT AND FORMER SBISD officers and employees who are involved or have been involved in the process of recruiting, selecting and assigning persons for TEACHING AND CLERICAL POSITIONS: and

h. SBISD's practices and policies with respect to compensation of employees in TEACHING AND CLERICAL POSITIONS.

For each procedure, process, standard, policy, practice, qualification, criteria or other factor identified, provide DOCUMENTS showing the dates of promulgation and utilization by SBISD.

7. All reports or other DOCUMENTS which summarize recruitment efforts undertaken, number of applications distributed, number of applications received or interviews conducted with respect to TEACHING AND CLERICAL POSITIONS in the SBISD.

8. All DOCUMENTS that contain information about any selection devices (including, for example, written employment tests, written applications, oral interviews, or references), CURRENTLY OR FORMERLY utilized by SBISD or contemplated to be utilized by SBISD, to select, assign, compensate, evaluate,

terminate or in any way effect the terms and conditions of employment of persons for TEACHING POSITIONS, and the weight given each selection device identified.

9. All DOCUMENTS pertaining to the supplying of student teachers to SBISD by any educational institution, including but not limited to all current and past agreements entered into by SBISD and any educational institution, or requests by SBISD to any educational institution or requests by any educational institution to SBISD, to supply student teachers, with applicable dates.

10. All CURRENT AND FORMER affirmative action plans or equal employment opportunity programs, by or for SBISD, together with the names and job titles of any SBISD officers or employees involved in or responsible for promulgating or implementing these plans or programs, with applicable dates.

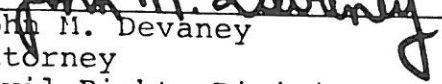
11. All DOCUMENTS relating to the promulgation or implementation of any affirmative action plans or equal employment opportunity programs identified in response to Request No. 10 above, with applicable dates.

12. All DOCUMENTS to and from the Equal Employment Opportunity Commission or the Department of Education (formerly the Department of Health, Education and Welfare), or any other federal or state agency, relating to compliance or suggestions for compliance with federal or state equal employment opportunity laws and regulations and/or affirmative action requirements, with applicable dates.

CERTIFICATE OF SERVICE

I certify that a true copy of the foregoing Plaintiff's Notice of Deposition of Henry H. Wheeler and the Attachment to the Notice of Deposition has been served upon counsel for the Defendants by courier delivery service, on this ____ day of January, 1987, at the following address:

Jeffrey A. Davis
Reynolds, Allen & Cook
3300 Allied Bank Plaza
Houston, Texas 77002



John M. Devaney
Attorney
Civil Rights Division
U.S. Department of Justice
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