

*Dray* - file

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

DELORES ROSS, a minor by  
her next Friend, Mary Alice  
Benjamin, et al.,

Plaintiffs,

UNITED STATES OF AMERICA,  
by ~~NICHOLAS deB. KATZENBACH~~,  
Attorney General of the  
United States,

Plaintiff-Intervenor,

ROBERT ECKELS, as President of  
the Board of Trustees of the  
Houston Independent School  
District, et al.,

Defendants.

*Lammy Clark*  
CIVIL ACTION NO. 10444

NOTICE OF MOTION AND  
MOTION FOR PRODUCTION  
OF DOCUMENTS

TO: Each Party and the Attorney of Record  
for Each Party:

PLEASE TAKE NOTICE that on \_\_\_\_\_,  
19\_\_\_\_, at \_\_\_\_\_, or as soon thereafter as  
counsel may be heard, in the courtroom of the United  
States District Court for the Southern District of Texas,  
Federal Courthouse, Houston, Texas, the United States  
will move this Court, pursuant to Rule 34 of the Federal  
Rules of Civil Procedure, for an order requiring the  
defendants, their officers, agents, servants, employees,  
and attorneys to produce and permit the plaintiff to  
inspect and copy or photograph the following:

*all class*  
2. *any* photographs of classes  
taken during the 1966-67 school year

1. All minutes or documents in the nature of records of meetings of the Board of Trustees of the Houston Independent School District for the period January 1, 1966 to date. *insert*

3. ~~All documents or records for the period January 1, 1965 to date~~ showing the number of students, by race, in each class, grade and school of the District *for the 1966-67 school year*

4. All documents or records for the period January 1, 1965 to date ~~reject for the 1966-67 school year~~ showing the number of teachers, by race, in each grade, in each class, in each school *for the 1966-67 school year.*

*not contained in the personnel records files described in para. 6, come back*  
5. All documents or records, ~~for the period January 1, 1965 to date~~ relating to hiring, continuation, discharge, assignment or transfer of teaching and other personnel including, but not limited to, educational background and degrees, length of service, contracts, assignment forms, transfer forms, requests for transfers, disposition of transfer requests, and transfer rules and regulations which have from time to time been promulgated. *int*

6. All documents or records for the 1964-65 and 1965-66 school years and proposed or planned for the 1966-67 school year showing schedules, district league assignments for interscholastic athletic competition of each district high school.

7. All documents and records relating to affiliation of District schools with the University Interscholastic League and the Texas Interscholastic League of Prarieview.

7. All documents and records for the 1964-65 and 1965-66 school years and proposed or planned for the 1966-67 school year showing the schedule and type of extra-curricula activities offered at each District school.

8. All documents or records indicating what elementary schools feed junior high schools and what junior high schools feed senior high schools.

9. All documents and records for the period January 1, 1960 to present showing student transfer requests and disposition of such requests including, but not limited to, the rules and regulations which have from time to time been promulgated, request forms and disposition of transfer request notices which have been utilized.

10. All documents, records, or applications, together with any documents, records, or reports attached thereto for the period January 1, 1960 to present, submitted to any accrediting agency, association or organization or submitted either voluntarily or under requirements of law to any governmental agency, department, bureau, etc.

11. All documents or records showing the curricula offered in each school for each grade for the 1964-65 and 1965-66 school year and proposed or planned for the 1966-67 school year.

12. All documents or records relating to classroom building, including, but not limited to:

- a. The insured valuation;
- b. The costs and dates of original construction and additions;
- c. Number of classrooms designated as either permanent or temporary in each school;
- d. Special facilities such as gymnasiums, cafeterias, auditoriums, etc.
- e. Number of square feet and acreage of each District school and school site.

✓ 13. All documents or records showing the number and cost of textbooks, library books, science and laboratory equipment and athletic equipment in each District school.

14. All documents or records showing the number, cost and date of acquisition of special teaching equipment in each District school including, but not limited to, motion picture equipment, televisions and audio and visual-aid equipment.

15. All documents or records showing counseling, nursing and other special services in each District school.

16. All documents or records showing the incidence of any contagious disease in each District school for the period January 1, 1960 to present.

? 17. All documents, records, reports, or studies which reflect the ability level, achievement record, etc. of students at District schools.

18. All documents, records, maps, etc. showing school bus routes and schedules for the ~~1965-66~~ school year and proposed or planned for the 1966-67 school year *and 67-68.*

19. All documents or records, including any forms to be filled out by transfer applicants, showing the procedures for assignment or enrolling students entering a district school for the first time, including students entering the first grade, students entering a higher school from a feeder school, and students newly resident ~~to~~ the district.

20. All petitions, complaints, requests, etc., from citizens addressed to the quality of education or facilities or the problem of segregation and replies or other documents reflecting the action taken.

21. All documents or records of whatever nature relating generally or specifically to aspects of desegregation not specifically set forth above.

22. All financial statements or reports for each District school for the period January 1, 1960 to date and budgetary proposals for the ~~1967-68~~ school year relating to:

- a. The expenditure per pupil;
- b. The expenditures for transportation, including expenditures for equipment and maintenance of equipment on each bus route;
- c. The expenditures *for each school* for textbooks and library materials, special services, counseling, nursing and other services;

*for each school*

- d. The expenditures <sup>for each school</sup> for interscholastic athletics, intramural athletics, extra-curricular athletics, etc.;
- e. The expenditures on the Adult Education Program;
- f. The valuation of equipment.

23. All maps showing existing school boundary zone lines and proposed boundary zone lines for new or proposed schools.

24. Exteriors and interiors of classrooms, auditoriums, gymnasiums, cafeterias, fields, etc., of all District schools.

This Motion will be based upon the pleadings and documents in the record of this case and upon the attached affidavit of Leigh H. Taylor.

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GERALD W. JONES

Attorney  
Department of Justice