

IN THE UNITED STATE DISTRICT COURT FOR THE
MIDDLE DISTRICT OF ALABAMA, EASTERN DIVISION

ANTHONY T. LEE, et al :

Plaintiffs, :

UNITED STATES OF AMERICA, :

Plaintiff-Intervenor :
and Amicus Curiae, :

CIVIL ACTION NO. 604-E

vs. :

MACON COUNTY BOARD OF EDUCATION, :
et al., :

Defendant. :

FILED

MAY 27 1969

BY R. C. DOBSON, CLERK
DEPUTY CLERK

ANSWER TO INTERROGATORIES

Now comes ALABAMA STATE TEACHERS ASSOCIATION, Plaintiff-
Intervenor in the above-entitled cause, and for Answer to Interro-
gatories heretofore propounded and saith as follows:

1. A- a) ARCHIE STEWART
b) Jackson County Board of Education
c) 1968
d) Principal
e) Jackson County Board of Education
f) Guidance Counselor
g) Unknown
h) A member of ASTA
i) Unknown, but this information is in the possession of the employing Board, Jackson County Board of Education. Affiant is informed and believes that the Jackson County Board of Education retains white principals who possess less qualifications, experience and time in service than Archie Stewart. Said white principals are still employed as principals.
- B- a) THOMAS WEATHERLY
b) Scottsboro City Board of Education
c) 1968
d) Principal
e) Scottsboro City Board of Education
f) Classroom teacher
g) Unknown
h) A member of ASTA
i) Unknown, but this information is in the possession of the employing Board, Scottsboro City Board of Education. Affiant is informed and believes that the Scottsboro City Board of Education retains white principals who possess less qualifications, experience and time in service than Thomas Weatherly. Said white principals are still employed as principals.

- C- a) JESSIE MONTGOMERY
b) Cleburne County Board of Education
c) 1967-1968
d) Principal
e) Cleburne County Board of Education
f) Classroom teacher
g) Unknown
h) A member of ASTA
i) Unknown, but this information is in the possession of the employing Board, Cleburen County Board of Education. Affiant is informed and believes that the Cleburne County Board of Education retains white principals who possess less qualifications, experience and time in service than Jessie Montgomery. Said white principals are still employed as principals.
- D- a) RICHARD A. STEWART
b) Sheffield City Board of Education
c) 1968
d) Principal
e) Sheffield City Board of Education
f) Classroom teacher
g) Unknown
h) A member of ASTA
i) Unknown, but this information is in the possession of the employing Board, Sheffield City Board of Education. Affiant is informed and believes that the Sheffield City Board of Education retains white principals who possess less qualifications, experience and time in service than Richard A. Stewart. Said white principals are still employed as principals.
- E- a) STEVE BARLOW
b) Covington County Board of Education
c) 1968
d) Principal
e) Covington County Board of Education
f)
g) \$1,000.00 annually
h) A member of ASTA
i) Unknown, but this information is in the possession of the employing Board, Covington County Board of Education. Affiant is informed and believes that the Covington County Board of Education retains white principals who possess less qualifications, experience and time in service than Steve Barlow. Said white principals are still employed as principals.
- F- a) ANDREW SMALL
b) DeKalb County Board of Education
c) Principal
d) DeKalb County Board of Education
e) Assistant-Principal and Classroom teacher
f) Classroom teacher
g) Unknown
h) A member of ASTA
i) Unknown, but this information is in the possession of the employing Board, DeKalb County Board of Education. Affiant is informed and believes that the DeKalb County Board of Education retains white principals who possess less qualifications, experience and time in service than Andrew Small. Saidwhite principals are still employed as principals.

- G- a) WALTER E. POPE
b) Walker County Board of Education
c) 1967
d) Principal
e) Walker County Board of Education
f)
g)
h) A member of ASTA
i) Unknown, but this information is in the possession of the employing Board, Walker County Board of Education. Affiant is informed and believes that the Walker County Board of Education retains white principals who possess less qualifications, experience and time in service than Walter E. Pope. Said white principals are still employed as principals.
- H- a) LUCIUS ROGERS
b) Marion County Board of Education
c) 1967
d) Vocational agriculture teacher
e) Shelby County Board of Education
f) Vocational agriculture teacher
g) Unknown
h) A member of ASTA
i) Not applicable
- I- a) WILMER CUNNINGHAM
b) Cherokee County Board of Education
c) 1968
d) Vocational agriculture teacher
e) Unknown
f) Unknown
g) Unknown; however, Mr. Cunningham was unable to obtain work in the public school system and on several occasions had to receive financial assistance from ASTA and the National Education Association.
h) A member of ASTA
i) Not Applicable
- J- a) ERVIN ROMINE
b) Cleburne County Board of Education
c) 1968
d) Vocational agriculture teacher
e) Talladega County Board of Education
f) Teacher
g) Approximately \$1,800.00
h) A member of ASTA
i) Not Applicable.
- K- a) RUTH CUNNINGHAM
b) Cherokee County Board of Education
c) 1968
d) Home economics teacher
e) Calhoun County Board of Education
f) Home economics teacher
g) Unknown
h) A member of ASTA
i) Not Applicable

2. See answer to Number 1 A, B, C, D, E, F, and G above.

3.	<u>A-NAME OF LOCAL SCHOOL BOARD</u>	<u>B-DATE</u>
	Butler County	1966-1967
	Chambers County	1967-68 & 1968-69
	Cherokee County	1967-68 & 1968-69
	Clarke County	1966-67 & (69-70)?
	Clay County	1966-1967
	Cleburne County	1968-1969
	Covington County	1967-1968
	DeKalb County	1968-1969
	Elmore County	1968-1969
	Escambia County	1966-1967
	Fayette County	1968-1969
	Geneva County	1968-1969
	Greene County	1967-1968
	Henry County	1967-1968
	Houston County	1967-1968
	Jackson County	1966-67 & 1968-69
	Marengo County	1968-1969
	Marion County	1966-67 & 1967-68
	Monroe County	1967-1968
	Morgan County	1967-1968
	Perry County	1967-1968
	Pike County	1967-1968
	Talladega County	1966-67; 68-69; (69-70)
	Tuscaloosa County	1968-1969
	Gadsden City	1967-1968
	Opp	
	Sheffield	1968-1969

4. See answer Number 1 H, I, J and K above.

5. See answer to Number 1 H, I, J and K above.

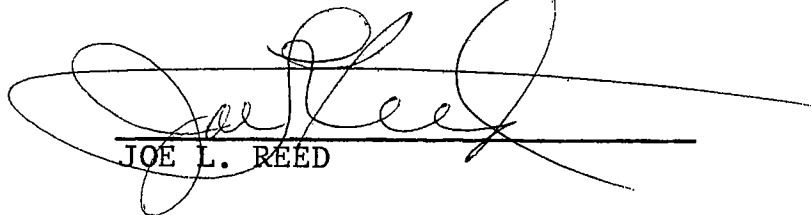
6. & 7. Section 6-B of Exhibit "A" to the Court's decree of March 22, 1967, which reads as follows:

Teachers and other professional staff members will not be discriminatorily assigned, dismissed, demoted, or passed over for retention, promotion, or rehiring, on the grounds of race or color. In any instance where one or more teachers or other professional staff members are to be displaced as a result of desegregation, no staff vacancy in the school system will be fulfilled through recruitment from outside the system unless no such displaced staff member is qualified to fill the vacancy. If, as a result of desegregation, there is to be a reduction in the total professional staff of the school system, the qualifications of all staff members in the system will be evaluated in selecting the staff member to be released without consideration of race or color. A report containing any such proposed dismissals, and the reasons therefor, shall be filed with the State Superintendent of Education.

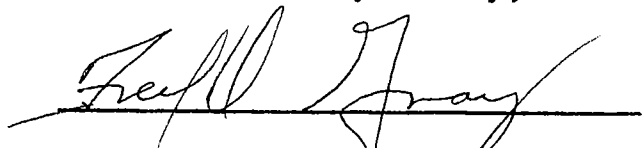
STATE OF ALABAMA)
:
MONTGOMERY COUNTY)

Before me the undersigned Notary Public in and for the State of Alabama at large, who being first duly sworn on oath deposes and says as follows:

My name is JOE L. REED, I am the Executive Secretary of Alabama State Teachers Association. I have read the foregoing Answers to Interrogatories which were prepared for Alabama State Teachers Association and that the foregoing Answers to Interrogatories are true and correct to the best of my knowledge, information and belief.


JOE L. REED

Sworn to and subscribed before
me this 27th day of May, 1969.



My Commission Expires: Sept. 14, 1970

GRAY, SEAY & LANGFORD
Attorneys for Alabama State
Teachers Association
352 Dexter Avenue
Montgomery, Alabama 36104

CERTIFICATE OF SERVICE

I hereby certify that on todays date, I have served a copy of the foregoing Answers to Interrogatories in open Court upon the following: Frank Allen, Attorney for the Justice Department; Ira DeMent, U.S. Attorney; Goodwyn, Smith & Bowman, Esqs.; Gordon Madison, Assistant Attorney General of the State of Alabama.

Dated: May 27th, 1969.

