



Jl-FL-0001-0015

IN THE UNITED STATES DISTRICT COURT FOR THE **FILED**  
NORTHERN DISTRICT OF FLORIDA  
TALLAHASSEE DIVISION

JAN 17 1967 *JS*

WILLIE CARL SINGLETON, a minor )  
by NEVA SINGLETON, his mother )  
and next friend, et al., )

OFFICE OF CLERK  
U. S. DISTRICT COURT  
NORTH DISTRICT FLA

Plaintiffs, )

vs. )

TALLAHASSEE CIVIL ACTION  
NO. 963

BOARD OF COMMISSIONERS OF STATE )  
INSTITUTIONS, et al., )

Defendants. )

OBJECTIONS TO INTERROGATORIES

TO: Honorable Earl M. Johnson  
Honorable Jack Greenberg  
Honorable Leroy D. Clark  
Honorable Sheila Rush Jones

Attorneys for Plaintiffs

Defendants in the above styled action, by and through the undersigned attorneys, object to the written interrogatories served herein by the above mentioned Plaintiffs on January 9, 1967, for the following reasons:

1. On October 5, 1966, this court entered a pretrial order directing the Defendants to file a proposed plan for desegregation for all facilities under the control of the said Defendants. In compliance with such order, Defendants did, on December 5, 1966, file a proposed plan of compliance. While the said plan is consistent with this court's order of October 5, 1966, and does in fact set forth a thorough and comprehensive evaluation of existing facilities, together with all steps begun, all steps completed to date, and all steps planned to be completed by July 1, 1967, insofar as complete and total desegregation is concerned, the Plaintiffs have, nevertheless, renewed

their demand for answer to certain interrogatories, which demand Defendants respectfully submit is unreasonable and endeavors to impose a vexatious and harassing burden on the Defendants.

2. The proposed plan for desegregation submitted by the Defendants contains what is earnestly felt to be all of the necessary and pertinent information so as to enable this court to intelligently evaluate and ascertain whether the matters embodied therein comply with this court's pronouncement in its order of October 5, 1966, with respect to the proposition that a state may not constitutionally require segregation of public facilities. The proposed plan endeavors to recognize such pronouncement by not only illustrating to this court those actions which have been taken and completed, but in addition reflects those steps which have been planned and which will be completed on or about July 1, 1967 within the contemplation of the order of this court. The interrogatories seek to elicit information presently contained in the proposed plan and, hence, are repetitious and not relevant nor necessary to the ultimate disposition by this court.

3. The interrogatories oppressively require the additional performance of difficult and expensive tasks in searching for facts in classifying and compiling data, notwithstanding the comprehensive undertaking performed by the Defendants in the preparation and submission of the proposed plan.

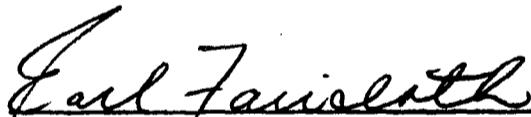
4. The interrogatories should not serve to satisfy idle curiosity and should the proposed plan be deemed by the Plaintiffs not to contain certain specific information which it desires to obtain, it is respectfully submitted that such

information should and can be obtained by the Plaintiffs through its own efforts by inspecting pertinent records of the Defendants which are available for inspection.

It is respectfully submitted that an examination of the proposed plan for desegregation will reveal a good faith effort on the part of the Defendants to comply with this court's order of October 5, 1966, and that such plan has, in fact, set forth an acceptable and reasonable pattern of compliance within the contemplation of this court's pronouncements.

WHEREFORE, Defendants respectfully move this Honorable Court for an order striking out all of the said interrogatories and excusing Defendants from answering said interrogatories.

It is further respectfully requested that this court make and enter an order accepting and approving the proposed plan for desegregation heretofore filed on December 5, 1966.

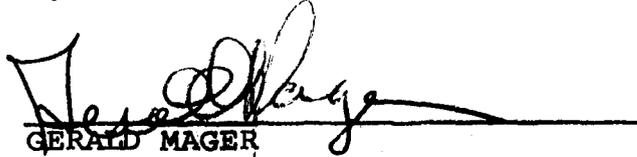
  
EARL FAIRCLOTH  
Attorney General

  
GERALD MAGER  
Assistant Attorney General  
ATTORNEYS FOR DEFENDANTS  
Capitol Building  
Tallahassee, Florida

CERTIFICATE OF SERVICE

I DO CERTIFY that a copy of the foregoing Objections to Interrogatories has been furnished to Honorable Earl M. Johnson, 625 West Union Street, Jacksonville, Florida; and

Honorable Jack Greenberg, Honorable Leroy D. Clark, and  
Honorable Sheila Rush Jones, 10 Columbus Circle, New York,  
New York 10019, by mail this <sup>16<sup>th</sup></sup>~~13<sup>th</sup>~~ day of January, 1967.

  
GERALD MAGER