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Brian K. Landsberg, Attorney
Southeastern Section

January 10, 1967

JSH:md
D.J. 144-100-2-1
1-087-2A

John S. Hedland, Attorney
Southeastern Section

Lee v. Macon Work Schedule Construction

A. Research Analysts

1) Research of our files:

- a) Preparation of chart showing enrollment, by race, in each Alabama school district for the last four or five years. Source: Annual Reports, Govt. brief, 7002's (1966-67);
- b) Preparation of list of districts which do not maintain full complement of schools for Negroes or white students. Source: 7002's survey reports; annual reports;
- c) Preparation of tabulation showing the districts where students are bussed in or out of the system, and the number of students of each race involved; 7002's, survey reports; annual reports;
- d) Determination of the capacity of and/or available classrooms in selected school districts. Source: Survey Reports; Insurance Schedules; Individual District Investigation Files;

cc. ~~Records~~
~~Chrono~~
~~Barratt~~
~~Ortenberg~~
Hedland

Owen Fiss

- e) Determination of presently contemplated construction, and construction in progress, and cost of same. Budget and Financial Records.
- 2) Preparation of charts for possible use at trial:
 - a) "Subminimal systems" where immediate consolidation is feasible on the face of the statistics;
 - b) Subminimal counties where feasibility of consolidation must be demonstrated by other means, and the data necessary to show such feasibility;
 - c) Similar charts for systems with inadequate physical plants or sites;
 - d) Charts or graphs summarizing probable number of students affected, and range of probable cost, in the event of the proposed order's adoption. (The format of this has not been decided upon yet).
 - 3) Preparation of necessary maps to illustrate individual county analyses.

B. Attorneys:

- 1) Supervision of preparation of the above.
- 2) Preparation of individual county analyses.
- 3) Determination of cost and student re-location factors; and the extent of the proposed order's effect on bussing.
- 4) Determination of some type of guidelines or standards for use in construction of new schools and additions to existing ones. Preparation of material applying such standards to as many systems as possible.

- 5) Determination and listing of all systems which have been the subject of a State Department Survey.

C. Necessary Workforce:

Two attorneys (Ortenberg and Hedland), one or two research analysts, at least one of whom is familiar with Lee v. Macon files, 1 typist.

Estimated "closing" date: January 16
(except for final preparation of maps, charts, or other "props".)