

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

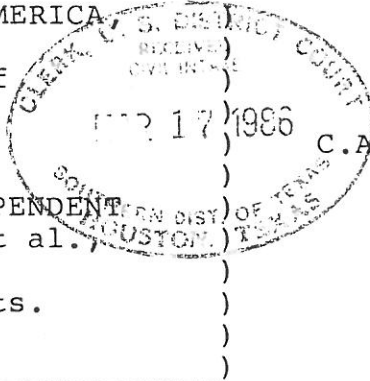
UNITED STATES OF AMERICA

Plaintiff

v.

SPRING BRANCH INDEPENDENT
SCHOOL DISTRICT, et al.

Defendants.



C.A. No. H-84-2949

PLAINTIFF UNITED STATES' MOTION TO COMPEL
ANSWERS AND PRODUCTION IN RESPONSE TO ITS SECOND
SET OF INTERROGATORIES AND ACCOMPANYING
REQUEST FOR PRODUCTION OF DOCUMENTS

Plaintiff United States herewith moves pursuant to Rule 37(a), F.R.C. P., to compel answers to interrogatories and production of documents sought in its discovery request served on defendants Spring Branch Independent School District on January 8, 1986.


The United States' complaint in this action alleges that defendants Spring Branch Independent School District, et al. ("SBISD") have pursued and continue to pursue a pattern or practice of discrimination against blacks in recruitment and hiring for teaching and clerical positions, in violation of Title VII of the Civil Rights Act of 1964, as amended, 42

U.S.C. ¶ 2000(e), et seq. On January 8, 1986, the United States served on SBISD its Second Set of Interrogatories and Accompanying Request for Production of Documents. These discovery requests seek information and documents relating to computer-related materials and expert and lay testimony which defendants intend to present at the trial of this action.

In a Response served on February 7, 1986, SBISD objected to each document request and virtually all of the interrogatories. On February 18, 1986, counsel for the United States conferred with counsel for defendants, but efforts to resolve these issues informally were unsuccessful. Accordingly, the United States hereby files this Motion to Compel Answers and Production to its Second Set of Interrogatories and Accompanying Request for Production of Documents.

A Memorandum in support of this Motion and a proposed Order are attached. Also attached are copies of the disputed discovery request and SBISD's response thereto.

Respectfully submitted,


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