

Q So you do not know, then, whether the lines have been gerrymandered?

A No.

Q Are you familiar with the attendance area lines of any other public school in the City of Chicago?

A No. It would only be hearsay.

Q Only hearsay?

A Yes. I am not familiar.

Q Then you do not know as a fact the lines of any other public school?

A No, I don't know as a fact, that is right.

Q Mrs. Kenley, you charge in paragraph tenth of the complaint that:

"There is inferior instruction at the Parker Elementary School."

Would you tell me in what respects it is inferior?

A In that our teachers are usually the newer, inexperienced teachers, and in that at the time that this was made, we were on double shift; our children were not allowed to bring books home, and even now it is rather difficult to get a book, and some of the books that you do get are not the books that they are actually studying from.

In other schools they have assemblies that help the children to learn about other things other than are taught in textbooks. We are told that we have too many students and this can't be done.

Well, the library -- for instance, our P.T.A. purchased Negro history books so that our children could learn and they aren't allowed to take these books home at all, and the few minutes that are spent in the library certainly doesn't give them the privilege of reading this.

I feel that -- not only I feel, I have seen at our school things that people in other areas tell me that they have or that they do that aren't happening in our school. For instance, the psychologist; when we asked of our principal, "Are there any people on the waiting list with a very large school like this," you are told that there aren't, and this just doesn't make sense to you when they tell you that they do have discipline problems, and I feel that they are not doing what they could do to help these children.

Q Is the reason that they are not doing what they could be doing in this school the fact that, as you say, Gregory --

MR. MONTGOMERY: Parker.

BY MR. HEDLUND:

Q -- Parker, I am sorry, is attended -- strike that question. Let me rephrase it.

Are there any white children in the Parker Elementary School to your knowledge?

A Not to my knowledge.

Q Now would you say that that is the reason that these things to which you have referred are not offered at Parker Elementary School?

A In my opinion it is because when I first came to Parker, there were a few.

Q A few?

A White children.

Q A few white children?

A And things that were offered at this time, like they had assemblies, beautiful ones, all of them died away to nothing. And when you go in and inquire about it, it was "We don't have the time" or "We don't do this, that or the other."

In fact, by reputation, this used to be one of the finest schools on the south side. That was before it became Negro.

Q These white children that were at one time in the Parker Elementary School, do you know why they are

not there now?

A Well, in most instances they have moved.

Q Mrs. Henley, what could the Board of Education have done in the Parker School to relieve overcrowding other than erect mobile classrooms?

A I feel that at the time that they erected these mobile classrooms, we asked that they transport the children to areas where they had under-utilized classrooms, but we were never given an answer.

Q What areas are there with under-utilized classrooms?

A I am not on the Board of Education, so I don't think that I really would be expected to know definitely where these places are because the Board members themselves don't seem to be able to tell us.

Q This may or may not be true, but I am asking you do you know of any vacant classrooms or vacant seats in the City of Chicago public schools?

A No, not personally.

Q Do you know of any within, let's say, one-half mile of the Parker Elementary School?

A I am trying to figure. One-half mile would be about what, four blocks either way?

Q Let's say 10 blocks either way; that is more than

grounds that Mr. Williams is familiar with one particular area and for him to make a statement on the question of whether the schools are or are not integrated when he would not have this factual information at his hand could be binding upon him at a later time.

BY MR. HEDLUND:

Q Mr. Williams, do you have factual information concerning the questions that I have just asked?

A I have no factual information concerning those questions.

Q Mr. Williams, what is a fringe neighborhood?

A By my definition it is one where on one side of a given line there are people of one particular race or ethnic group, whereas on the other side of this line there are people of another race or ethnic group.

Q Are schools located on such fringe areas integrated?

A To the best of my knowledge, in my general area such schools are not integrated.

Q Where are the fringe areas in your neighborhood?

A One such area would be between South Park and Halsted Street.

Q I am sorry. South Park and --

be Cottage Grove Avenue and beyond. This is going south beyond 95th Street, and, I believe, then it jumps over two or three streets east of Cottage, and there is a definite division there between ethnic groups. That is on the east of the general area we are talking about, the Burnside-Gillespie School area.

BY MR. HEDLUND:

Q Mr. Williams, are you familiar with the schools in this area to which you have just referred?

A I am familiar with the schools in what I am going to call the Negro side of these boundaries.

Q Are you familiar with the Perry Elementary School?

A I am somewhat.

Q Do you know if there are Negroes in attendance at the Perry Elementary School?

A To my knowledge there are none. I can't swear to that because I have no facts on that school.

Q Do you have any facts on the schools on the other side of this fringe area?

A I have no facts on those schools.

Q Your facts are confined to the schools within this area that you have described?

A Yes, and they are generally confined further to my observations.

Q Mr. Williams, are there any schools in this area in which there are white pupils in attendance?

A To my knowledge there are no schools in this area I have just described in which there are white students in attendance.

Q Mr. Williams, have you ever attempted to enroll your two children in a school other than Burnside or Gillespie?

A Yes.

Q What school was that?

A I attempted to enroll them once in the Perry School.

Q What date was that?

A It was school opening day, September -- I don't know the exact date, but it was in 1961.

Q Mr. Williams, were you permitted to enroll your children in the Perry School?

A I was not permitted to enroll my children in the Perry School.

Q Were you given a reason why such enrollment was refused?

A Yes, I was told that the Board of Education had assigned my children to the Burnside School.

Q Now --

A And that they would not be permitted to enroll in the Perry School.

Q Mr. Williams, was the reason that you were refused permission to enroll your children in the Perry School the fact that you were Negro?

A That was not the stated reason.

Q Do you believe that that was the reason?

A I do.

Q On what basis?

A From my observation it appears that in the area I have defined the School Board has restricted Negro children to the schools I have indicated which are segregated schools, and I would assume therefore that they have likewise restricted the white children outside of these areas to the white schools.

Q Mr. Williams, do you know of any white families living within this area that you have described whose children are permitted to attend any public schools outside of that area?

A I have no definite knowledge of any such children.

Q Have you heard of such children living there?

A I have not.

Q Mr. Williams, how far do you live from the Gillespie School at present?



A At the present time I live about five blocks from the Gillespie School.

Q Within walking distance of your residence?

A Yes.

Q Do you know of any schools having vacant classrooms or vacant seats?

A I have no factual data on this.

Q Do you have any data at all?

A I only have hearsay information that there are vacant classrooms in the Perry School.

Q Have you ever observed these vacant classrooms?

A I have not personally observed them.

Q Could I ask you the names of those people that informed you of the existence of vacant classrooms?

A Actually I wasn't informed by an individual. I read numerous reports and one of them I recall now, I believe it was an Urban League report on vacant classrooms which I believe indicated that there were vacant classrooms in the Perry School.

Q Do you have a copy of this report?

A I do not have a copy.

Q Mr. Williams, do you know of the existence of vacant classrooms or vacant seats in any other school in the City of Chicago?

instruction"?

MR. ZUBER: Same instruction.

BY MR. HEDLUND:

Q Mr. Williams, are the facilities at the Gillespie School over-utilized?

A I have no facts on enrollment or facilities sufficiently to answer you on that.

Q Then you have no opinion as to whether or not they are?

A I have an opinion that they are over-utilized, yes.

Q You have an opinion?

A Yes.

Q On what do you base that opinion?

A By the number of children attending and what I believe to be the number of classrooms in the school.

Q Do you have any idea how many children attend Gillespie?

A Yes, I believe there must be somewhere around 1200 children, approximately.

Q Do you know how many classrooms there are at the Gillespie School?

A Approximately 25.

I told you I have no facts on this school as

to enrollment.

Q This is just a general impression?

A General impression, yes.

Q Do you know how many pupils are in either of your daughters' classes as of June of last year?

A The exact numbers I couldn't tell.

Q A rough estimate?

A Rough estimate, approximately 40 to 45.

Q In each?

A In each room.

Q That is in each of the rooms of your daughters?

A Yes.

Q Mr. Williams, you stated in the amended complaint, page 7, paragraph 14, that in one of the schools attended by the plaintiff children -- I assume that at this time one of your children was in attendance at Burnside, is that correct?

A At the time of this complaint, yes.

Q It states that:

"Three kindergarten classes are being conducted on the stage of the auditorium of the Burnside School."

Was either of your children in that class?

A No, neither of my children were in kindergarten

at that time.

Q Do you know for a fact three kindergarten classes were being conducted on the stage?

A I know that classes were being conducted on the stage at that time.

Q Did you observe them being conducted on the stage?

A I did observe them on one occasion, yes.

Q What occasion was that?

A An occasion on which I visited the school and saw classes on the stage.

Q Could you give me a date for that?

A I can't give you the exact date, no. It was shortly after the opening of school in September, 1961.

Q How many children were on the stage?

A As to numbers, I couldn't tell you.

Q Were there 50 or were there a hundred twenty-five?

A I would estimate there was somewhere between 100 and perhaps 125.

Q Did you ask anyone about that class or the classes being held in the auditorium?

A I asked someone at that time, and I don't recall now whether it was a teacher or the principal, whether

or not these were the classes on the stage, and, as I recall now, the person asked did indicate that these were classes.

Q Did they indicate they were kindergarten classes?

A I don't remember now whether or not they said they were kindergarten classes or what, but I do remember they said they were classes.

Q Mr. Williams, at the beginning of this deposition you stated that the neighborhood school policy -- correct me, please, if I am wrong -- the neighborhood school policy is a policy of assigning public school pupils to the school in their neighborhood?

A Whether or not those are my exact words, I am not sure now.

MR. HEDLUND: Could we go back to get the answer to that, please?

(Record read by the reporter.)

BY MR. HEDLUND:

Q Now, Mr. Williams, with that definition, you state in paragraph fifth of the amended complaint that:

"The utilization of the neighborhood school policy in such areas must of necessity produce segregated schools."

Why?

A Well, if the neighborhood school policy established by the Board of Education is along the lines neighborhoods generally run in Chicago, they would result in segregated schools -- they do result in segregated schools.

Q Is that because the Board of Education requires pupils to attend school in their neighborhood?

A This is because the Board of Education requires pupils to attend schools in attendance areas that they assign.

Q Mr. Williams, is there an integrated school within walking distance of your residence?

A None that I knew of.

Q Is there an all-white school within walking distance of your residence?

A I am sure there are. One example I think is the Ferry School.

Q Do you know of any other schools?

A By name I do not know.

Q By location?

A Generally schools across the boundaries that I have indicated.

Q These boundaries are within walking distance of