

C O P Y

"EXHIBIT A"

STATE OF SOUTH CAROLINA)

COUNTY OF CLARENDON)

P E T I T I O N

To: The Board of Trustees for School District Number 22, Clarendon County, South Carolina, R. W. Elliott, Chairman, J. D. Carson and George Kennedy, Members; The County Board of Education for Clarendon County, South Carolina, L. B. McCord, Chairman, Superintendent of Education for Clarendon County, A. J. Plowden, W. E. Baker, Members, and H. B. Betchman, Superintendent of School District #22.

Your petitioners, Harry, Eliza, Harry, Jr., Thomas Lee, Katherine Briggs, and Thomas Gamble; Henry, Thelma, Vera, Beatrice, Willie, Marian, Ethel Mae and Howard Brown; James Theola, Thomas Euralia and Joe Morris Brown; Onetha, Hercules and Hilton Bennett; William, Annie, William Jr., Maxine and Harold Gibson; Robert, Carrie, Charlie and Jervine Georgia; Gladys and Joseph Hilton; Lila Mae, Celestine and Juanita Huggins; Gussie and Roosevelt Hilton; Thomas, Blanche E., Lillie Eva, Rubie Lee, Betty J., Bobby M. and Preston Johnson; Susan, Raymond, Eddie Lee and Susan Ann Lawson; Frederick, Willie and Mary Oliver; Mose, Leroy and Mitchel Oliver; Bennie, Jr., Plummie and Celestine Parson; Edward, Sarah, Shirley and Deloris Ragin; Hazel, Zelia and Sarah Ellen Ragin; Rebecca and Mable Ragin; William and Glen Ragin; Lychriser, Elane and Emanuel Richardson; Rebecca and Rebecca I. Richburg; E. E. and Albert Richburg; Lee, Bessie, Morgan and Samuel Gary Johnson; Lee, James, Charles, Annie L., Dorothy and Jackson Richardson; Mary O., Francis and Benie Lee Lawson; Mary, Daisy and Louis, Jr., Oliver; Esther F. Singleton and Janie Fludde; Henry, Mary and Irene Scott; Willie M., Gardenia, Willie M. Jr., Gardenia, and Louis W. Stukes; Gabriel and Annie Tindal, Mary L. and Lilliam Bennett, children of public school age, eligible for elementary and high school education in the public schools of School District #22, Clarendon County, South Carolina, their parents, guardians and next friends respectfully represent:

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1. That they are citizens of the United States and of the State of South Carolina and reside in School District #22 in Clarendon County and State of South Carolina.
2. That the individual petitioners are Negro children of public school age who reside in said county and school district and now attend the public schools in School District #22, in Clarendon County, South Carolina, and their parents and guardians.
3. That the public school system in School District #22, Clarendon County, South Carolina, is maintained on a separate, segregated basis, with white children attending the Summerton High School and the Summerton Elementary School, and Negro children forced to attend the Scott Branch High School, the Liberty Hill Elementary School or Rambay Elementary School solely because of their race and color.
4. That the Scott's Branch High School is a combination of an elementary and high school, and the Liberty Hill and Rambay Elementary Schools are elementary schools solely.
5. That the facilities, physical condition, sanitation and protection from the elements in the Scott's Branch High School, the Liberty Hill Elementary School and Rambay Elementary School, the only three schools to which Negro pupils are permitted to attend, are inadequate and unhealthy, the buildings and schools are old and overcrowded and in a dilapidated condition; the facilities, physical condition, sanitation and protection from the elements in the Summerton High in the Summerton Elementary Schools in school district number twenty-two are modern, safe, sanitary, well equipped, lighted and healthy and the buildings and schools are new, modern, uncrowded and maintained in first class condition.
6. That the said schools attended by Negro pupils have an insufficient number of teachers and insufficient class room space, whereas the white schools have an adequate complement of teachers and adequate class room space for the students.
7. That the said Scott's Branch High School is wholly deficient and totally lacking in adequate facilities for teaching courses in

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General Science, Physics and Chemistry, Industrial Arts and Trades, and has no adequate library and no adequate accommodations for the comfort and convenience of the students.

8. That there is in said elementary and high schools maintained for Negroes no appropriate and necessary central heating system, running water or adequate lights.

9. That the Summerton High School and Summerton Elementary School, maintained for the sole use, comfort and convenience of the white children of said district and county, are modern and accredited schools with central heating, running water, adequate electric lights, library and up to date equipment.

10. That Scott's Branch High School is without services of a janitor or janitors, while at the same time janitorial services are provided for the high school maintained for white children.

11. That Negro children of public school age are not provided any bus transportation to carry them to and from school while sufficient bus transportation is provided to white children traveling to and from schools which are maintained for them.

12. That said schools for Negroes are in an extremely dilapidated condition, without heat of any kind other than old stoves in each room, that said children must provide their own fuel for said stoves in order to have heat in the rooms, and that they are deprived of equal educational advantages with respect to those available to white children of public school age of the same district and county.

13. That the Negro children of public school age in School District #22 and in Clarendon County are being discriminated against solely because of their race and color in violation of their rights to equal protection of the laws provided by the 14th amendment to the Constitution of the United States.

14. That without the immediate and active intervention of this Board of Trustees and County Board of Education, the Negro children of public school age of aforesaid district and county will continue to be deprived of their constitutional rights to equal protection of the laws and to freedom from discrimination because of race or color in the educational facilities and advantages which the said

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District #22 and Clarendon County are under a duty to afford and make available to children of school age within their jurisdiction.

WHEREFORE, Your petitioners request that: (1) the Board of Trustees of School District Number twenty-two, the County Board of Education of Clarendon County and the Superintendent of School District #22 immediately cease discriminating against Negro children of public school age in said district and county and immediately make available to your petitioners and all other Negro children of public school age similarly situated educational advantages and facilities equal in all respects to that which is being provided for whites; (2) That they be permitted to appear before the Board of Trustees of District #22 and before the County Board of Education of Clarendon, by their attorneys, to present their complaint; (3) Immediate action on this request.

Dated 11 November 1949

(Signed) Harry Briggs	(Signed) Maxine Gibson
" Eliza Briggs	" Harold Gibson
" Harry Briggs, Jr.	
" Thomas Lee Briggs	" Robert Georgia
" Katherine Eliza Briggs	" Carrie Georgia
" Thomas Gamble	" Charlie Georgia
" Henry Brown	" Jervine Georgia
" Thelma Brown	
" Vera Brown	" Gladys E. Hilton
" Beatrice Brown	" Joseph Hilton
" Willie H. Brown	" Henrietta Huggins
" Marion Brown	" Lila Mae Huggins
" Ethel Mae Brown	" Celestine Huggins
" Howard Brown	" Juanita Huggins
" James Brown	" Gussie Hilton
" Theola Brown	" Roosevelt Hilton
" Thomas Brown	" Thomas Johnson
" Euralia Brown	" Blanch E. Johnson
" Joe Morris Brown	" Lillie Eva Johnson
" Onetha Bennett	" Rubie Lee Johnson
" Hercules Bennett	" Betty J. Johnson

(Signed) Hilton C. Bennett	(Signed) Bobby M. Johnson
" William Gibson	" Preston Johnson, Jr.
" Annie Gibson	" Susan Lawson
" William Gibson, Jr.	" Raymon Lawson
" Eddie Lee Lawson	
" Susan Ann Lawson	
" Frederick Oliver	
" Willie Oliver	
" Mary Oliver	
" R M Mose Oliver	(Signed) Lee Richardson
" Leroy Oliver	" James Richardson
" Mitchel Oliver	" Charles Richardson
" Bennie Parson, Jr.	" Annie L. Richardson
" Plummie Parson	" Dorothy I. Richardson
" Celestine Parson	" Jackson Richardson
" Edward Ragin	" Mary O. Lawson
" Sarah Ragin	" Francis Lawson
" Shirley Ragin	" Bennie Lee Lawson
" Deloris Ragin	" Mary J. Oliver
" Hazel Ragin	" Daisy D. Oliver
" Zelia Ragin	" Louis Oliver, Jr.
" Sarah Ellen Ragin	
" Rebecca Ragin	
" Mable Ragin	" Esther F. Singleton
" William Ragin	" Janie L. Fludde
" Ellen Ragin	" Henry Scott
" Luchrisher Richardson	" Mary Scott
" Elane Richardson	" Irene Scott
" Emanuel L Richardson	" Willie M. Stukes
" Rebecca Richburg	" Gardenia Stukes
" Rebecca I. Richburg	" Willie Modd Stukes Jr.
" E. E. Richburg	" Gardenia E. Stukes
" Albert Richburg	" Louis W. Stukes
" Lee Johnson	" Gabriel Tindal
" Bessie Johnson	" Annie S. Tindal
" Morgan Johnson	" Mary L. Bennett
" Samuel Gary Johnson	" Lillian Bennett
Petitioners	Petitioners

Attorneys for Petitioners

(Signed) Harold R. Boulware

" Thurgood Marshall

" Robert L. Carter