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United States District Court

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Nov 28 4 26 PM '62

RICHMOND, VIRGINIA

FOR THE

EASTERN DISTRICT OF VIRGINIA

CIVIL ACTION FILE NO. 3579

MARSHAL'S RETURN FILED

DEC - 5 1962

Walkley E. Johnson, Clerk

MARK J. BEATON, JR., an infant by MARK J. BEATON & JUANITA BEATON, his father & mother & next friends,

Plaintiff

v. S.

ALFRED L. WINGO, ET AL

Defendant

SUMMONS IN CIVIL ACTION

SUMMONS

12377

Approved for Filing

FBI-TR-8-8-60-110M-180E

To the above named Defendant :

You are hereby summoned and required to serve upon S. W. Tucker

[SEAL]

plaintiff's attorney whose address is 214 E. Clay St., Richmond, Va.

Service

3.00

Travel

none

By

Signature of Deputy United States Marshal

Deputy United States Marshal

United States Marshal

an answer to the complaint which is herewith served upon you, within twenty days after service of this summons upon you, exclusive of the day of service. If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint.

WALKLEY E. JOHNSON

Signature of Alice P. Barne, Deputy Clerk

Date: Nov. 28, 1962

[Seal of Court]

I received this summons and served it together with the complaint herein as follows: on the 30th day of November 1962 I served the same on the herein named ALFRED L. WINGO, by delivering a true copy thereof to Attorney A. B. Scott, Attorney of Record, who accepted such service

Rule 4 of the Federal Rules of Civil Procedure

1962

RETURN ON SERVICE OF MAIL

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA

Richmond Division

MARK J. BELTON, JR., an infant,
by Mark J. Belton and Juanita
Belton, his father and mother
and next friends,

CIVIL ACTION

NO. 3579

BARBARA BLAND,
ERVIN LEON BLAND,
JOYCE L. BLAND and
SHIRLEY BLAND, infants, by
Susie C. Bland, their mother
and next friend,

D

FILED

BLANCHE C. BLAND and
JOHN A. BLAND, infants, by
Levi Bland and Sadie C. Bland,
their father and mother and
next friends,

NOV 20 1932

KENNETH W. BLAND, an infant, by
Clarence Bland and Lenora Bland,
his father and mother and next
friends,

WALKLEY E. JOHNSON, CLERK
UNITED STATES DISTRICT COURT.

ALONZO BUMBRY, an infant, by
Helen Newman, his mother and
next friend,

ANNIE L. BUMBRY, an infant, by
Josiah Bumbry and Estelle
Bumbry, her father and mother
and next friends,

CAROLYN F. BUMBRY,
GARY VINCENT BUMBRY and
JEFFREY NORDLINGER BUMBRY, infants,
by George N. Bumbry, their
father and next friend,

IRVING WAYNE BUMBRY, an infant,
by Irving L. Bumbry and
Ruby E. Bumbry, his father and
mother and next friends,

RICHARD WEBSTER BUMBRY, JR., an
infant, by Richard Webster
Bumbry, Sr., and Margie Bumbry,
his father and mother and next
friends,

PATRICIA F. CLARK, an infant, by :
Frank E. Clark and Mary E. Clark, :
her father and mother and next :
friends, :

BERNARD D. HARRIS and :
THEODORE R. HARRIS, JR., infants, :
by Theodore R. Harris and Sarah :
V. Harris, their father and :
mother and next friends, :

LAWRENCE E. HODGE, JR., an infant, :
by Lawrence E. Hodge, Sr. and :
Bertha Hodge, his father and :
mother and next friends, :

CAROLYN D. JACKSON, :
GEORGE EDWARD JACKSON, :
HAZEL G. JACKSON, :
SHIRLEY ANN JACKSON and :
WILLIE PRESTON JACKSON, infants, :
by Clarence P. Jackson and Ida :
Mae Jackson, their father and :
mother and next friends, :

SHERYL LASHAY JOHNSON, an infant, :
by Booker T. Johnson and Edna :
B. Johnson, her father and :
mother and next friends, :

BARBARA JEAN NEWTON, an infant, :
by Charles F. Newton, her father :
and next friend, :

PERRY LEE SCRANAGE, JR. and :
SHARON SCRANAGE, infants, by :
Perry Lee Scranage, Sr. and :
Mary Bell Scranage, their father :
and mother and next friends, :

CORLETTE L. SMITH, :
CORNELIOUS GEORGE SMITH, :
FLOYD L. SMITH, :
JUNE E. SMITH, :
LEDROW E. SMITH and :
RITA L. SMITH, infants, by :
George E. Smith and Lindora :
Smith, their father and mother :
and next friends, :

ALVIN EUGENE WILLIAMS, :
BARBARA ANN WILLIAMS, :
SHIRLEY JANE WILLIAMS and :
WARREN ELLIS WILLIAMS, infants, by :
James I. Williams and Emma L. :
Williams, their father and :
mother and next friends, :

MARK J. BELTON, :
JUANITA BELTON, :
SUSIE C. BLAND, :
LEVI BLAND, :
SADIE C. BLAND, :
CLARENCE BLAND, :
LENORA BLAND, :
HELEN NEWMAN, :
JOSIAH BUMBRY, :
ESTELLE BUMBRY, :
GEORGE N. BUMBRY, :
IRVING L. BUMBRY, :
RUBY E. BUMBRY, :
RICHARD WEBSTER BUMBRY, SR., :
MARGIE BUMBRY, :
FRANK E. CLARK, :
MARY E. CLARK, :
THEODORE R. HARRIS, :
SARAH V. HARRIS, :
LAWRENCE E. HODGE, SR., :
BERTHA HODGE, :
CLARENCE P. JACKSON, :
IDA MAE JACKSON, :
BOOKER T. JOHNSON, :
EDNA B. JOHNSON, :
CHARLES F. NEWTON, :
PERRY LEE SCRANAGE, SR. :
MARY BELL SCRANAGE, :
GEORGE E. SMITH, :
LINDORA SMITH, :
JAMES I. WILLIAMS and :
EMMA L. WILLIAMS, :

Plaintiffs, :

vs. :

COUNTY SCHOOL BOARD OF KING GEORGE :
COUNTY, VIRGINIA, :

RAYMOND E. OWENS :
Route 1, King George, Virginia :

STUART A. ASHTON :
Route 2, King George, Virginia :

E. R. MORRIS, JR. :
King George, Virginia :

T. BENTON GAYLE, Division Superin- :
tendent of Schools of King :
George County, Virginia :

E. J. OGLESBY, ALFRED L. WINGO and :
E. T. JUSTIS, individually and con- :
stituting the Pupil Placement :
Board of the Commonwealth of Virginia :

Defendants :

COMPLAINT

I

1. (a) Jurisdiction of this Court is invoked under Title 28, United States Code, Section 1331. This action arises under the Fourteenth Amendment of the Constitution of the United States, Section 1, and under the Act of Congress, Revised Statutes, Section 1977, derived from the Act of May 31, 1870, Chapter 114, Section 16, 16 Stat. 144 (Title 42, United States Code, Section 1981), as hereafter more fully appears. The matter in controversy, exclusive of interest and costs, exceeds the sum of Ten Thousand Dollars (\$10,000.00).

(b) Jurisdiction is further invoked under Title 28, United States Code, Section 1343. This action is authorized by the Act of Congress, Revised Statutes, Section 1979, derived from the Act of April 20, 1871, Chapter 22, Section 1, 17 Stat. 13 (Title 42, United States Code, Section 1983), to be commenced by any citizen of the United States or other person within the jurisdiction thereof to redress the deprivation under color of state law, statute, ordinance, regulation, custom or usage of rights, privileges and immunities secured by the Fourteenth Amendment to the Constitution of the United States and by the Act of Congress, Revised Statutes, Section 1977, derived from the Act of May 31, 1870, Chapter 114, Section 16, 16 Stat. 144 (Title 42, United States Code, Section 1981), providing for the equal rights of citizens and of all persons within the jurisdiction of the United States as hereafter more fully appears.

II

2. Infant plaintiffs are Negroes, are citizens of the United States and of the Commonwealth of Virginia, and are residents of and domiciled in the political subdivision of Virginia for which the defendant school board maintains and operates public schools. Said infants are within the age limits of eligibility to attend, and possess

all qualifications and satisfy all requirements for admission to, said public schools.

3. Adult plaintiffs are Negroes, are citizens of the United States and of the Commonwealth of Virginia, and are residents of and domiciled in said political subdivision. They are parents or guardians or persons standing in loco parentis of one or more of the infant plaintiffs.

4. Plaintiffs bring this action in their own behalf and, there being common questions of law and fact affecting the rights of all other Negro children attending public schools in the Commonwealth of Virginia and, particularly, in the said political subdivision, and the parents and guardians of such children, similarly situated and affected with reference to the matters here involved, who are so numerous as to make it impracticable to bring all before the court, and a common relief being sought, as will hereinafter more fully appear, the plaintiffs also bring this action, pursuant to Rule 23(a) of the Federal Rule of Civil Procedure, as a class action on behalf of all other Negro children attending public schools in the Commonwealth of Virginia and, particularly, in said political subdivision, and the parents and guardians of such children, similarly situated and affected with reference to the matters here involved.

III

5. The Commonwealth of Virginia has declared public education a state function. The Constitution of Virginia, Article IX, Section 129, provides:

"Free schools to be maintained. The General Assembly shall establish and maintain an efficient system of public free schools throughout the State."

Pursuant to this mandate, the General Assembly of Virginia has established a system of public free schools in the Commonwealth of Virginia according to a plan set out in Title 22, Chapters 1 to 15, inclusive,

of the Code of Virginia, 1950. The establishment, maintenance and administration of the public school system of Virginia is vested in a State Board of Education, a Superintendent of Public Instruction, Division Superintendent of Schools, and County, City and Town School Boards (Constitution of Virginia, Article IX, Sections 130-133; Code of Virginia, 1950, Title 22, Chapter 1, Section 22-2).

IV

6. The defendant school board, the corporate name of which is stated in the caption, exists pursuant to the Constitution and laws of the Commonwealth of Virginia as an administrative department of the Commonwealth, discharging governmental functions, and is declared by law to be a body corporate. Said school board is empowered and required to establish, maintain, control and supervise an efficient system of public free schools in said political subdivision, to provide suitable and proper school buildings, furniture and equipment, and to maintain, manage and control the same, to determine the studies to be pursued and the methods of teaching, to make local regulations for the conduct of the schools and for the proper discipline of the students, to employ teachers, to provide for the transportation of pupils, to enforce the school laws, and to perform numerous other duties, activities and functions essential to the establishment, maintenance and operation of the public free schools in said political subdivision. (Constitution of Virginia, Article IX, Section 133; Code of Virginia, 1950, as amended, Title 22.)

7. The defendant division superintendent of schools, whose name as such officer is stated in the caption, holds office pursuant to the Constitution and laws of the Commonwealth of Virginia as an administrative officer of the public free school system of Virginia. (Constitution of Virginia, Article IX, Section 133; Code of Virginia, 1950, as

amended, Title 22.) He is under the authority, supervision and control of, and acts pursuant to the orders, policies, practices, customs and usages of, the defendant school board. He is made a defendant herein in his official capacity.

8. A Virginia statute, first enacted as Chapter 70 of the Acts of the 1956 Extra Session of the General Assembly, viz, Article 1.1 of Chapter 12 of Title 22 (Sections 22-231.1 through 22-232.17) of the Code of Virginia, 1950, as amended, confers or purports to confer upon the Pupil Placement Board all power of enrollment or placement of pupils in the public schools in Virginia and to charge said Pupil Placement Board to perform numerous duties, activities and functions pertaining to the enrollment or placement of pupils in, and the determination of school attendance district for, such public schools, except in those counties, cities or towns which elect to be bound by the provisions of Article 1.2 of Chapter 12 of Title 22 (Sections 22-232.18 through 22-232.31) of the Code of Virginia, 1950, as amended. (Section 22-232.30 of the Code of Virginia, 1950, as amended.) The names of the individual members of the Pupil Placement Board are stated in the caption.

V

9. Notwithstanding the holding and admonitions in Brown v. Board of Education, 347 U. S. 483, and 349 U. S. 294, the defendant school board maintains and operates a bi-racial school system in which certain schools (or a certain school) are designated for Negro students only and are staffed by Negro personnel and none other and certain schools (or a certain school) are designated for white students and are staffed by white personnel. This pattern continues unaffected except in the few instances, if any there are, in which individual Negroes have sought and obtained admission to one or more of the schools designated for

white students. The defendants have not devoted efforts toward initiating nonsegregation in the public school system, neither have they made a reasonable start to effectuate a transition to a racially non-discriminatory school system, as under paramount law it is their duty to do. Deliberately and purposefully, and solely because of race, the defendants continue to require all or virtually all Negro public school children to attend schools where none but Negroes are enrolled and none but Negroes are employed as principal or teacher or administrative assistant and to require all white public school children to attend school where no Negroes, or at best few Negroes, are enrolled and where no Negroes teach or serve as principal or administrative assistant.

10. As matters of routine, every white child entering school for the first time is initially assigned to and placed in a school which predominantly, if not exclusively, is attended by white children; or if otherwise assigned, then, upon request of the parents or guardians, such child is transferred to a school which, being attended exclusively or predominantly by white children, is considered as a school for white children. Upon graduation from elementary school, every white child is routinely assigned to a high school or junior high school which is predominantly, if not exclusively, attended by white children. Similarly, and with few if any exceptions, Negro children entering school for the first time are initially assigned to a school which none but Negroes attend and upon their graduation from elementary school they are routinely assigned to a high school or to a junior high school which none but Negroes attend.

11. To avoid the racially discriminatory result of the practice described in the paragraph next preceding, the Negro child, or his parent or guardian for him, is required to make application for

transfer from the school which none but Negroes attend to a school specifically named. In acting upon such application for transfer from the all-Negro school, the defendants take into consideration certain criteria which defendants do not consider when making initial enrollments or placements in any school other than the initial placement or enrollment of a Negro child in a school which white children attend. If such criteria are not met, the application for transfer is denied. For example, if the home of the applicant is closer to the school to which he has been assigned than to the school to which transfer is sought, the application is denied notwithstanding the fact that the latter school is attended by white children similarly situated with respect to residence. For further example, if intelligence, achievement or other standardized test scores or other academic records of the applicant do not compare favorably with the best or the better of similar scores or records of children attending or assigned to the school which the applicant seeks to attend, the application is denied notwithstanding the fact that many white children attending said school have lower scores or lower academic records than the applicant has.

VI

12. Application was made to the defendants for the admission of some of the infant plaintiffs to one or more of the public schools in said political subdivision heretofore and now attended exclusively or predominantly by white persons. In some of such cases the refusal of the application was made known to the parent or guardian of the infant applicant by a letter from the Pupil Placement Board indicating the placement of the child in a certain school, which school is one attended exclusively by Negroes. In some of these cases written protests of the placement were made to the Pupil Placement Board within

the time prescribed by statute; whereupon the Pupil Placement Board scheduled hearings upon the protests. To the extent that such details can now be stated with certainty, the attached "Schedule A" sets out the name of such infant plaintiff and, if such application was made on his or her behalf, (1) the school assignment to which was requested, (2) the date of the letter from the Pupil Placement Board and the name of the all-Negro school in which the child was thereby placed, (3) the reason assigned for the denial of the application, and (4) the date and place of hearing on the protest. In the case of each infant plaintiff, even those who with their parents attended the hearing on the protest, the assignment to the all-Negro school stands.

13. But for the deliberate purpose of the defendants to avoid performance of their duty as hereinabove mentioned in paragraph 9 hereof, plaintiffs would have had no need to apply for attendance at certain schools. But for the fact that the defendants intend to maintain the racially segregated pattern of public schools through the routine practices described in paragraph 10 hereof, the applications made on behalf of the infant plaintiffs would have been granted. Solely by reason of the practices, customs, usages and calculated result thereof as mentioned and complained of in paragraph 11 hereof, the placement of each infant plaintiff in an all-Negro school was confirmed, even after protest. Unless and until the defendants, as a result of injunction or otherwise, will cease and desist from the practice and usage mentioned in paragraph 11, applications and protests will be vain and futile when made on behalf of any Negro child situated as the infant plaintiffs are with regard to residence or with regard to intelligence, achievement or other standardized test scores or other academic records.

14. For reasons stated in paragraphs 9 through 13 hereof and for reasons apparent upon the face of the Virginia statute pertaining to Enrollment or Placement of Pupils (the above-mentioned Sections 22-231.1 through 22-232.17 of the Code of Virginia, 1950, as amended), plaintiffs allege that the said statute does not provide an adequate remedy for the relief they seek.

VII

15. The refusal of the defendants to grant the requested assignments, viewed in the light of the refusal of the defendants to bring about the elimination of racial discrimination in the public school system and to make a reasonable start to effectuate a transition to a racially non-discriminatory system, constitutes a deprivation of the liberty of the infant plaintiffs as well as all other Negro public school children within said political subdivision and a denial of their right to the equal protection of the laws secured by the Fourteenth Amendment to the Constitution of the United States, and a denial of rights secured by Title 42, United States Code, Section 1981.

16. Plaintiffs and those similarly situated and affected are suffering irreparable injury and are threatened with irreparable injury in the future by reason of the policy, practice, custom and usage and the actions of the defendants herein complained of. They have no plain, adequate or complete remedy to redress the wrongs and illegal acts herein complained of other than this complaint for an injunction. Any other remedy to which plaintiffs and those similarly situated could be remitted would be attended by such uncertainties and delays as would deny substantial relief, would involve a multiplicity of suits, and would cause further irreparable injury and occasion damage, vexation and inconvenience.

17. By letter from plaintiff's counsel dated 25 October 1962, the defendant school board and the defendant division superintendent of schools were requested to devise and implement a plan to bring about a racially nondiscriminatory school system at the earliest practical date. Said letter indicated that litigation seeking an injunction against racial discrimination would be withheld for at least thirty days for an expression of willingness of said school authorities to undertake a solution to the problems of desegregation of the school system. No reply has been received. The defendants Raymond E. Owens, Stuart A. Ashton and E. R. Morris, Jr. are the members of the defendant school board and were such members on and prior to October 25, 1962.

18. The taxation of fees for plaintiffs' attorneys as a part of the costs in this case is essential to the doing of justice. The infant plaintiffs have been subjected to discriminatory and oppressive conduct by public officials who are charged to protect the rights herein asserted. This action would not have been required save for the action of the individual members of the Pupil Placement Board in voting to deny the applications of the infant plaintiffs for racially nondiscriminatory assignment to public schools and the deliberate inaction of the individual members of the defendant school board with respect to performance of the duty of the school authorities to devote every effort toward initiating desegregation and bringing about the elimination of racial discrimination in the public school system.

VIII

WHEREFORE, plaintiffs respectfully pray:

(A) That this Court enter an interlocutory and a permanent injunction restraining and enjoining defendants, and each of them, their successors in office, and their agents and employees, forthwith, from denying infant plaintiffs, or either of them, solely on account of race or color, the right to be enrolled in, to attend and to be educated in, the public schools to which they, respectively, have sought admission.

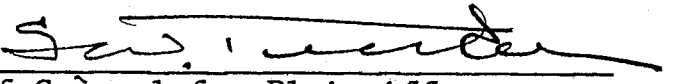
(B) That this Court enter a permanent injunction restraining and enjoining defendants, and each of them, their successors in office, and their agents and employees from any and all action that regulates or affects, on the basis of race or color, the initial assignment, the placement, the transfer, the admission, the enrollment or the education of any child to and in any public school.

(C) That, specifically, the defendants and each of them, their successors in office, and their agents and employees be permanently enjoined and restrained from denying the application of any Negro child for assignment in or transfer to any public school attended by white children when such denial is based solely upon requirements or criteria which do not operate to exclude white children from said school.

(D) That the defendants be perpetually restrained and enjoined from operating a biracial school system or, in the alternative, that the defendants be required to submit a plan for the reorganization of schools on a unitary nonracial basis.

(E) That the defendants pay to plaintiffs the costs of this action and attorney's fees in such amount as to the Court may appear reasonable and proper.

(F) That plaintiffs have such other and further relief as
is just.


Of Counsel for Plaintiffs

S. W. TUCKER
HENRY L. MARSH, III
214 East Clay Street
Richmond 19, Virginia

Counsel for Plaintiffs

SCHEDULE "A" to complaint against County School Board of King George County, Virginia, et al, defendants

0 Infant Plaintiff	1 Requested Assignment	2 Date of Letter From Pupil Placement Board and Placement Made Thereby	3 Reason Assigned For Denial	4 Date and Place Of Hearing on Protest
Mark J. Belton, Jr.	King George Elementary School	June 20, 1962 Ralph Bunche	Lack of academic qualifications	August 14, 1962 Richmond, Virginia
Barbara Bland	Potomac Elementary	June 20, 1962 Ralph Bunche	Lack of academic qualifications	August 14, 1962 Richmond, Virginia
Ervin Leon Bland	King George High	June 20, 1962 Ralph Bunche	Distance from residence to school; Lack of academic qualifications.	August 14, 1962 Richmond, Virginia
Joyce L. Bland	Potomac Elementary	June 20, 1962 Ralph Bunche	Lack of academic qualifications	August 14, 1962 Richmond, Virginia
Shirley Bland	King George High	June 20, 1962 Ralph Bunche	Distance from residence to school; Lack of academic qualifications.	August 14, 1962 Richmond, Virginia
Blanche C. Bland	King George High	June 20, 1962 Ralph Bunche	Distance of residence from school; Lack of academic qualifications; Failure to state reason for desired school.	August 14, 1962 Richmond, Virginia
John A. Bland	King George High	June 20, 1962 Ralph Bunche	Distance of residence from school; Lack of academic qualifications; Failure to state reason for desired school.	August 14, 1962 Richmond, Virginia
Kenneth W. Bland	Potomac Elementary	June 20, 1962 Ralph Bunche	Lack of academic qualifications	August 14, 1962 Richmond, Virginia
Alonzo Bumbry	King George High	June 20, 1962 Ralph Bunche	Distance from residence to school; Lack of academic qualifications; Failure to state reason for desired school.	August 14, 1962 Richmond, Virginia

SCHEDULE "A" to complaint against County School Board of King George County, Virginia, et al, defendants

0 Infant Plaintiff	1 Requested Assignment	2 Date of Letter From Pupil Placement Board and Placement Made Thereby	3 Reason Assigned For Denial	4 Date and Place Of Hearing on Protest
Annie L. Bumbry	King George High	June 20, 1962 Ralph Bunche	Lack of academic qualifications; Failure to state reason for desired school.	August 14, 1962 Richmond, Virginia
Carolyn F. Bumbry	King George Elementary	Ralph Bunche	Distance from residence to school	August 14, 1962 Richmond, Virginia
Gary Vincent Bumbry	King George Elementary	Ralph Bunche	Distance from residence to school	August 14, 1962 Richmond, Virginia
Jeffrey Nordlinger Bumbry	King George Elementary	Ralph Bunche	Distance from residence to school	August 14, 1962 Richmond, Virginia
Irving Wayne Bumbry	King George High	June 20, 1962 Ralph Bunche	Lack of academic qualifications; Failure to state reason for desired school.	August 14, 1962 Richmond, Virginia
Richard Webster Bumbry, Jr.	Potomac Elementary	June 20, 1962 Ralph Bunche	Lack of academic qualifications; Failure to state reason for desired school.	August 14, 1962 Richmond, Virginia
Patricia F. Clark	King George High	Ralph Bunche	Lack of academic qualifications	August 14, 1962 Richmond, Virginia
Bernard D. Harris	King George Elementary	June 21, 1962 Ralph Bunche	Distance from residence to school; Lack of academic qualifications; Failure to state reason for desired school.	August 14, 1962 Richmond, Virginia
Theodore R. Harris, Jr.	King George High	June 21, 1962 Ralph Bunche	Distance from residence to school; Lack of academic qualifications; Failure to state reason for desired school.	August 14, 1962 Richmond, Virginia
Lawrence E. Hodge, Jr.	King George High	June 21, 1962 Ralph Bunche	Distance from residence to school; Lack of academic qualifications; Failure to state reason for desired school.	August 14, 1962 Richmond, Virginia

SCHEDULE "A" to complaint against County School Board of King George County, Virginia, et al, defendants.

0 Infant Plaintiff	1 Requested Assignment	2 Date of Letter From Pupil Placement Board and Placement Made thereby	3 Reason Assigned For Denial	4 Date and Place Of Hearing on Protest
Carolyn D. Jackson	King George High	June 21, 1962 Ralph Bunche	Distance from residence to school; Lack of academic qualifications	August 14, 1962 Richmond, Virginia
George Edward Jackson	King George High	June 21, 1962 Ralph Bunche	Distance from residence to school	August 14, 1962 Richmond, Virginia
Hazel G. Jackson	Potomac Elementary	June 21, 1962 Ralph Bunche	Lack of academic qualifications	August 14, 1962 Richmond, Virginia
Shirley Ann Jackson	King George	June 21, 1962 Ralph Bunche	Distance from residence to school; Lack of academic qualifications.	August 14, 1962 Richmond, Virginia
Willie Preston Jackson	King George High	June 21, 1962 Ralph Bunche	Distance from residence to school	August 14, 1962 Richmond, Virginia
Sheryl LaShay Johnson	King George High	June 21, 1962 Ralph Bunche	Distance from residence to school; Lack of academic qualifications; Failure to state reason for desired school.	August 14, 1962 Richmond, Virginia
Barbara Jean Newton	King George High	Ralph Bunche	Distance from residence to school; Lack of academic qualifications.	August 14, 1962 Richmond, Virginia
Perry Lee Scranage, Jr.	King George High	Ralph Bunche	Lack of academic qualifications	August 14, 1962 Richmond, Virginia
Sharon Scranage	Potomac Elementary	Ralph Bunche	Distance from residence to school	August 14, 1962 Richmond, Virginia
Corlette L. Smith	King George	Ralph Bunche	Distance from residence to school; Lack of academic qualifications.	August 14, 1962 Richmond, Virginia
Cornelious George Smith	King George	Ralph Bunche	Distance from residence to school; Lack of academic qualifications.	August 14, 1962 Richmond, Virginia

SCHEDULE "A" to complaint against County School Board of King George, Virginia, et al, defendants

0 Infant Plaintiff	1 Requested Assignment	2 Date of Letter From Pupil Placement Board and Placement Made thereby	3 Reason Assigned For Denial	4 Date and Place Of Hearing on Protest
Floyd L. Smith	King George	Ralph Bunche	Distance from residence to school; Lack of academic qualifications.	August 14, 1962 Richmond, Virginia
June E. Smith	King George	Ralph Bunche	Distance from residence to school; Lack of academic qualifications.	August 14, 1962 Richmond, Virginia
Ledrow E. Smith	King George	Ralph Bunche	Distance from residence to school; Lack of academic qualifications.	August 14, 1962 Richmond, Virginia
Rita L. Smith	King George	Ralph Bunche	Lack of academic qualifications.	August 14, 1962 Richmond, Virginia
Alvin Eugene Williams	King George	June 21, 1962 Ralph Bunche	Distance from residence to the school; Failure to state reason for desired school.	August 14, 1962 Richmond, Virginia
Barbara Ann Williams	King George High	June 21, 1962 Ralph Bunche	Distance from residence to the school; Lack of academic qualifications; Failure to state reason for desired school.	August 14, 1962 Richmond, Virginia
Shirley Jane Williams	King George	June 21, 1962 Ralph Bunche	Distance from residence to the school; Failure to state reason for desired school.	August 14, 1962 Richmond, Virginia
Warren Ellis Williams	King George	June 21, 1962 Ralph Bunche	Distance from residence to the school; Lack of academic qualifications; Failure to state reason for desired school.	August 14, 1962 Richmond, Virginia