

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; Luchrisher, 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 Fluda; Henry, Mary and Irene Scott; Willie M. , Gardenia, Willie M. Jr., Gardenia, and Louis W. Stukes; Gabriel and Annie Tindal, Mary L. and Lillian 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:



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 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 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 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

Harry Briggs	Maxine Gibson
Eliza Briggs	Harold Gibson
HARRY BRIGGS JR.	
THOMAS LEE BRIGGS	
Kathrine Eliza Briggs	Robert Yeargin
Thomas Bogle	Carrie Georgie
Harry Brown	Charlie Georgia
Julius Brown	Jermine Georgia
Nera Brown	
Beatrice Brown	Glady E. Hilt
Willie H Brown	Joseph Hilton
Marian Brown	Henrietta Huggins
Ethel Mae Brown	Lila Mae Huggins
Howard Brown	Celestine Huggins
James Brown	Gussita Huggins
Thiola Brown	Gussie Hilton
Thomas Brown	Roosevelt Hilton
Eurahia Brown	Thomas Johnson
Joe Morris Brown	Blanch E. Johnson
Oyella Bennett	Lillie Eva Johnson
Hercules Bennett	Rudie Lee Johnson
Hilton C. Bennett	Betty J. Johnson
William Gibson	Bobby M. Johnson
Annie Gibson	Preston Johnson
William Gibson Jr	Susan Lawson
	Raymon Lawson



Eddie L. Lawson

Susan Ann Lawson

Fredrick Elmer

Willie Oliver

Mary Jane Oliver

Ben Wood Oliver

LeRoy O. Oliver

Mitchel O. Oliver

Bennie Parson Jr.

Plummi Parson

Celestine Parson

Edward Ragin

Sarah Ragin

Shirley Ragin

Deloris Ragin

Boyd Ragin

Bella Ragin

Sarah Ellen Ragin

Rebecca Ragin

Mable Ragin

William Ragin

Glen Ragin

Lucy Sh. Richardson

E. Lore Richardson

Emanuel S. Richardson

Rebecca Richburg

Rebecca I. Richburg

E. Richburg

Albert Richburg

Lee Johnson

Bessie Johnson

Morgan Johnson

Samuel Gay Johnson

Petitioners

Attorneys for Petitioners

Harold A. Paulson

Thurgood Marshall

Robert L. Carter

Lee Richardson

James Richardson

Charles Richardson

Anie L. Richardson

Worthy S. Richardson

Jackson D. Richardson

Mary D. Thayer

Francis Lawson

Bennie Lee Lawton

Mary J. Oliver

Daisy Oliver

Louis Oliver Jr.

Esther F. Singleton

Janie L. Thudde

Henry Scott

Mary Scott

Wrene S. Scott

Wilkie M. Stokes

Larunia Stokes

Willie Wood Stokes

Gaudenia S. Stokes

Louis W. Stokes

Gabriel Tindal

Annie L. Tindal

Mary L. Bennett

Gillian Bennett

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