



JI-FL-0001-0034

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF FLORIDA
JACKSONVILLE DIVISION

WILLIE CARL SINGLETON, a minor by
NEVA SINGLETON, his mother and next
friend, et al.,

Plaintiffs,

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CIVIL ACTION

NO. 63-243-Civ J

VS.

BOARD OF COMMISSIONERS OF
STATE INSTITUTIONS, et al.,

Defendants,

:

:

FILED

DEC 23 1963
JACKSONVILLE, FLA.
JULIAN A. BLAIR
CLERK

MOTION FOR PRELIMINARY INJUNCTION

Plaintiffs move this court for a preliminary injunction pending final hearing and determination of this action as prayed for in said complaint and on the grounds set forth therein and herewith:

1. Unless restrained by this Court the defendant, Board of Commissioners of State Institutions, will continue to deny the minor plaintiffs and all other Negro children similarly situated the right to equal access to all facilities, recreational, educational and otherwise under their control at the Florida State Schools for Boys and Girls, solely because of their race.

2. Unless restrained by this Court, the defendant named above, acting under the authority conferred upon them by Sections 955.01 and 956.03 of the Florida Statutes, will continue to maintain and operate the Florida State Schools for Boys and Girls, on a racially segregated basis, as is required by Sections 955.12 of the Florida Statutes, thereby depriving plaintiffs and all Negro children incarcerated in said Schools of equal protection and due process of the laws, Secured by the Fourteenth Amendment to the United States Constitution.

3. Unless restrained by this Court the defendant named

above, will continue to assignment and limit professional and custodial personnel to the care of the confined juveniles on the basis of race and color, thereby perpetuating and re-inforcing the System of racial segregation.

4. Should the plaintiffs be required to wait until this action is finally heard and disposed of to obtain injunction relief and this Court not immediately restrain the defendant, the plaintiffs and all other Negro children, are irrevocably denied each day, their constitutional right not to be deprived of equal access to publicly owned facilities or to be racially Segregated in governmentally operated institutions.

5. The issueance of preliminary injunction herein will not cause undue inconvenience or loss to the defendant, but will prevent irreparable injury to the plaintiffs.

Respectfully Submitted

Earl M. Johnson

Earl M. Johnson
625 West Union Street
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Attorney for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the attached Motion for Preliminary Injunction and notice of motion have/^{been}served on the Attorneys for the defendant, Richard W. Ervin, Attorney General of the State of Florida and Gerald Mager, Assistant Attorney General of the State of Florida, by mailing a copy to the office of the Attorney General in the Capitol Building in Tallahassee, Florida, this 21st day of December 1963.

Earl M. Johnson

EARL M. JOHNSON