EXHIBIT A

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Attorneys for Plaintiffs

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF LOS ANGELES

822854

MARY ELLEN CRAWFORD, a Minor, by ELLEN CRAWFORD, her Guardian Ad Litem; INITA WATKINS, a Minor, by CLARA M. WATKINS, her Guardian Ad Litem, for and in behalf of themselves and all pupils of the David Starr Jordan High School, similarly situated,

Plaintiffs,

v.

BOARD OF EDUCATION OF THE CITY OF LOS ANGELES,

Defendant.

No.

COMPLAINT FOR DECLARATORY JUDGMENT AND INJUNCTION

I

Plaintiff Mary Ellen Crawford resides at 9601 Maie Avenue, Los Angeles, California. She is a pupil at the David Starr Jordan High School; she is a Negro.

Plaintiff Inita Watkins resides at 2166 E. 97th Street, Los Angeles, California. She is a pupil at the David Starr Jordan High School; she is a Negro.

Each of the plaintiffs bring this action for and in behalf

of themselves, and for and in behalf of all the pupils of the said David Starr Jordan High School (to be hereinafter referred to as Jordan High School) all of whom are of the Negro race, all of whom have been discriminated against solely because of their race, to be set forth hereinafter, and who are too numerous all to be named as plaintiffs herein, being over 1600 in number.

II

The defendant is the governing agency administering the public schools located within the Los Angeles School District, including particularly the Jordan High School.

III

Attached hereto, marked Exhibit A, and incorporated herein by reference is a portion of a map published by said defendant Board showing the location of said High School; as well as of the Southgate High School, approximately one and one-half miles distant from said Jordan High School. Said map also shows the respective school districts in which said high schools are located.

The school districts in which said Jordan High School and said Southgate High School, respectively, are located, are respectively virtually completely racially segregated districts, the former being virtually entirely (namely over 99%) Negro; and the latter being virtually completely (namely, over 97%) white.

Pupils living in said districts, of high school age, respectively, are required by the defendant Board to attend said segregated high schools, respectively.

All of the pupils in said Southgate High School are of the Caucasian race, with the exception of approximately five pupils.

Said high schools are segregated high schools, the former Negro, the latter white.

IV

At a time to the plaintiffs unknown, and known exclusively to the defendant Board, said Board determined to enlarge the capacity

of, and otherwise to rebuild, said Jordan High School, and to expend approximately $1,000,000.00 to enlarge and rebuild said High School; the Board and its members knew the racial composition of said High School, namely that it is 100% Negro, and knew that said enlargement of said High School would have the effect of maintaining, indurating and perpetuating said High School as a Negro racially segregated High School.

V

The defendant Board has heretofore, on numerous occasions, been requested to take corrective measures to desegregate said Jordan High School, and/or to eliminate the racial imbalance therein; but said Board has refused, and now does refuse to do so.

Said Board has additionally heretofore been requested not to expend public funds to enlarge said High School, until it has first taken the corrective steps aforesaid, but it has rejected said request also.

Said Board will expend the monies aforesaid, without first taking the corrective steps hereinabove set forth, unless enjoined from such expenditure by this Court.

VI

The maintenance by the defendant Board of said Jordan High School as a racially segregated school, and the plan and purpose of said Board to continue to maintain, indurate, and perpetuate said High School as a racially segregated school, deprives the plaintiffs, and each of them, and all of the pupils at said High School, of equal opportunities for education; and denies them the equal protection of the laws, as guaranteed by the Fourteenth Amendment to the Constitution of the United States, and of due process of law in abridgement of said Fourteenth Amendment; and deprives them of similar rights guaranteed by the Constitution of the State of California.

Said acts of the defendant Board constitute, additionally, invidious and unconstitutional racial discrimination, in violation

of the constitutional provisions aforesaid.

VII

Unless the defendant Board takes immediate affirmative measures to desegregate said High School, and, unless said Board refrains from expending the monies aforesaid, without first taking such corrective steps, the plaintiffs are being and will be, deprived of their constitutional rights as hereinabove set forth.

VIII

Such deprivation results in irreparable injury, for which the plaintiffs have no, and/or no adequate remedy at law, in that

(1) because intangible considerations relating to the ability to learn and exchange views with other students, a segregated public high school does not provide equal educational opportunities to the plaintiffs; and

(2) separation of the plaintiffs and others of similar age and qualifications solely because of race, may produce a feeling of inferiority which can never be removed.

IX

A controversy exists between the plaintiffs and the defendant as follows:

The plaintiffs contend that the defendant Board is under two legal and constitutional duties;

1) not to take any affirmative action which maintains and/or perpetuates racial imbalance; and, hence, not to enlarge or rebuild the Jordan High School, without first taking steps to desegregate said High School; and

2) to take affirmative corrective measures to remove the racial imbalance at said High School.

The defendant Board contends that it has neither of the above two legal or constitutional duties.

X

Wherefore, plaintiffs seek, for themselves, and for all of

the pupils at said Jordan High School, relief as follows:

1. For a declaratory judgment

a) declaring their rights, if any, herein; and declaring the duties, if any, of the defendant Board;

b) declaring that the defendant Board is under a legal and constitutional duty to take immediate measures to correct the racial imbalance at the Jordan High School.

2. For a judgment adjudging the acts of the defendant Board to have deprived the plaintiffs of the equal protection of the laws, and of due process of law.

3. For a judgment requiring the defendant Board to take, forthwith, steps to correct the racial imbalance at the Jordan High School.

4. For a preliminary injunction, pendente lite, and/or until further orders of the court, enjoining the defendant Board from enlarging the Jordan High School, and/or expending any funds for construction and/or reconstruction of said High School.

5. For such other relief as may be appropriate; and for their costs.

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A. L. WIRIN
FRED OKRAND
HERBERT A. BERNHARD
Attorneys for Plaintiffs.

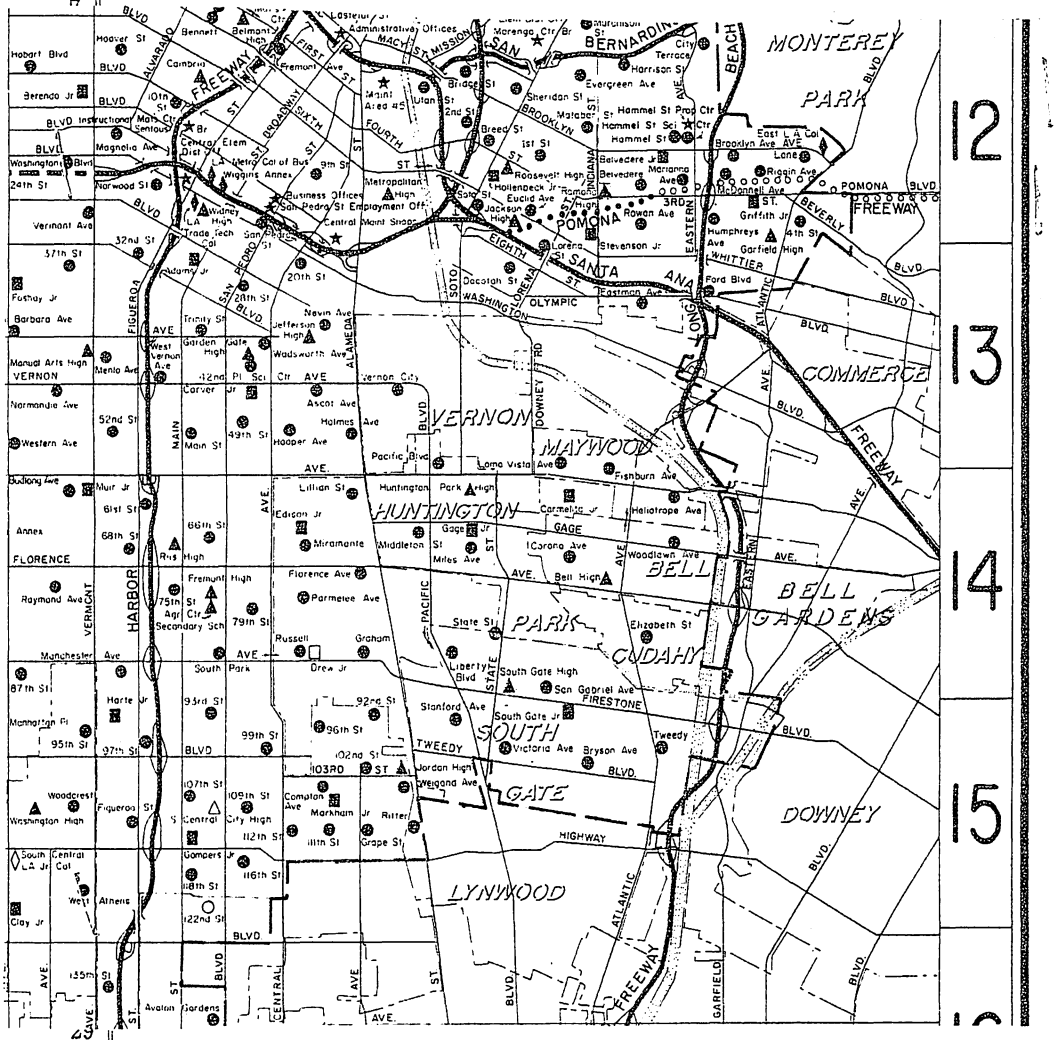

MONTEREY PARK
SAN BERNARDINO
POMONA
COMMERCE
VERNON
MAYWOOD
HUNTINGTON PARK
BELL
BELL GARDENS
SOUTH GATE
PARAMOUNT
DOWNEY
LYNWOOD
FLORENCE
12
13
14
15

Exhibit A

(VERIFICATION — 446 and 2015.5 C.C.P.)

STATE OF CALIFORNIA, County of Los Angeles } ss.

I, the undersigned, say: I am one of the plaintiffs

in the above entitled action; I have read the foregoing Complaint for Declaratory Judgment and Injunction

and know the contents thereof; and that the same is true of my own knowledge, except as to the matters which are therein stated upon my information or belief, and as to those matters that I believe it to be true.

I certify (or declare) under penalty of perjury, that the foregoing is true and correct.

Executed on JUL 31 1963 (date) at Los Angeles (place), California.

CLARA M. WATKINS (Signature)

Received copy of the within _____ this _____ day of _____, 19___

Attorney for _____

Received copy of the within _____ this _____ day of _____, 19___

Attorney for _____

(PROOF OF SERVICE BY MAIL — 1013a, and 2015.5 C.C.P.)

STATE OF CALIFORNIA, County of Los Angeles } ss.

I, the undersigned, say: I am and was at all times herein mentioned, a citizen of the United States and a resident of the County of Los Angeles, over the age of eighteen years and not a party to the within action or proceeding; that my business address is (residence employed in) _____,

that on _____, 19___, I served the within _____

on the ___ _____ in said action or proceeding by depositing a true copy thereof, inclosed in a sealed envelope with postage thereon fully prepaid, in a mail-box, sub-post office, substation, or mail chute (or other like facility), regularly maintained by the Government of the United States at[1] _____

in the City of Los Angeles, California addressed to the attorney of record for said _____

at the office address (residence) of said attorney _____, as follows:[2] "

I certify (or declare) under penalty of perjury that the foregoing is true and correct.

Executed on _____ (date) at _____ (place), California

_____ (Signature)

[1]If deposited in the United States Post Office, cross out appropriate words and insert "in the United States Post Office". [2]Here quote from envelope name and address of addressee.

COAST STATIONERY CO.
FORM 162

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SUMMONS	SUPERIOR COURT OF THE STATE OF CALIFORNIA FOR THE COUNTY OF LOS ANGELES	Case Number 822854

MARY ELLEN CRAWFORD, a Minor, by ELLEN CRAWFORD, her Guardian Ad Litem; INITA WATKINS, a Minor, by CLARA M. WATKINS, her Guardian Ad Litem, for and in behalf of themselves and all pupils of the David Starr Jordan High School, similarly situated,

Plaintiff(s)

vs.

BOARD OF EDUCATION OF THE CITY OF LOS ANGELES,

Defendant(s)

THE PEOPLE OF THE STATE OF CALIFORNIA to the above named ..... Defendant(s):

You are directed to appear in an action brought against you by the above named plaintiff..... in the Superior Court of the State of California for the County of Los Angeles, and to answer the ..... Complaint therein within ten days after the service on you of this Summons, if served within the County of Los Angeles, or within thirty days if served elsewhere, and you are notified that unless you appear and answer as above required, the plaintiff..... will take judgment for any money or damages demanded in the ..... Complaint, as arising upon contract, or will apply to the Court for any other relief demanded in the ..... Complaint.

Dated AUG – 1 1963

WILLIAM G. SHARP, County Clerk and Clerk of the Superior Court of the State of California for the County of Los Angeles

By E. Robinson Deputy

(SEAL)

(Space below for notice when required by Sec. 410, 474 C.C.P.)

*APPEARANCE: "A defendant appears in an action when he answers, demurs, files a notice of motion to strike, or gives the plaintiff written notice of his appearance, or when an attorney gives notice of appearance for him." (Section 1014 Code of Civil Procedure.)

Answers, demurrers and all other pleadings, must be in writing, in form pursuant to rule of court, **ACCOMPANIED WITH THE NECESSARY FEE**, and filed with the Clerk of this Court, and should be accompanied by proof of service of a copy thereof on plaintiff or his attorney.

A pleading is a formal allegation of a claim or defense. (Section 420 Code of Civil Procedure). It must be typewritten or printed on legal size opaque white paper with numbered lines, bound at the top, numbered consecutively at the bottom. (Rule 201, Rules for the Superior Courts).

(See reverse side for Proof of Service)

DECLARATION OF SERVICE

I, the undersigned, hereby state: That I was, at the time of the service of the papers herein referred to over the age of eighteen years and not a party to the within entitled action; I served the within summons by delivering to and leaving with the person or persons personally, hereinafter named, a copy thereof, together with a copy of the complaint therein mentioned, at the address and on the date set forth opposite each name of said person or persons, in the County of ....., State of California, to-wit:

Name of Defendants Served	City and Street Address	Date of Service

My fees for services are: $..... for ..... miles actually traveled at ..... cents per mile,

$....., Total, $.....

That if the above service was against a corporation, or against associates conducting business under a common name in the manner authorized by Section 388 of the Code of Civil Procedure, a notice that the person was served on behalf of said corporation or said associates appeared on the copy of the summons that was served, as required by Section 410 of said Code.

That if service of within summons was made upon the person served as an individual as well as on behalf of the corporation or associates conducting a business under a common name, notice of that fact appeared on the copy of the summons that was served.

That if a defendant was served under a fictitious name a notice of identity was endorsed on the face of the copy of the summons as required by Section 474 of the Code of Civil Procedure.

Fee for Service $....., Mileage $....., Total $.....

Executed on ..... (date), at ..... (place), California.

I declare under penalty of perjury that the foregoing is true and correct.

.....
(Signature of Declarant)

* If service is upon a corporation, partnership, or association, state its name and the name and official title of person to whom copy of within is delivered.