

IN THE DISTRICT COURT OF THE UNITED STATES
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION

NATHANIEL JACKSON, A Minor, by
his Father and Next Friend,
W. D. Jackson,

CHARLES MOODY, A Minor, by his
Mother and Next Friend (Mrs.)
Jemie Irene Moody, a feme sole,

FLOYD STEVENSON MOODY, A Minor,
by his Father and Next Friend,
Jay Moody,

Plaintiffs,

CIVIL ACTION

VS.

NO. 3152

O. C. RAWDON, as President of the
Board of Trustees of the Mansfield
Independent School District, Mansfield,
Tarrant County, Texas, and BILLY ARBOR, EUBERT BEARD,
IRA GIBSON, HORACE HOWARD, J. R. LEWIS, O. N. WILSHIRE,
as Members of the Board of Trustees of the Mansfield
Independent School District, and R. L. HUFFMAN, as
Superintendent of Public Schools of the Mansfield
Independent School District, Mansfield, Tarrant
County, Texas, and THE MANSFIELD INDEPENDENT SCHOOL
DISTRICT, a Corporation,

Defendants.

PETITION FOR STAY OF ENFORCEMENT OF
DECREE DATED AUGUST 27, 1956.

Come now the defendants in the above entitled and numbered
cause and move the Court to grant a stay of enforcement of the decree
of August 27, 1956, in the above cause on the following grounds:

The plaintiffs in the above entitled and numbered cause,
as well as those similarly situated, have by voluntary action on
their part, and prior to June 1, 1956, transferred from the Mans-
field Independent School District to the Fort Worth Independent
School District, and are enrolled, by reason thereof, in the Fort
Worth Independent School District, and by virtue of such transfer
voluntarily made by them, the allotment for their education in
the amount of \$75.00 each per year has been transferred to the
Fort Worth Independent School District and is not re-transferable
back to the Mansfield Independent School District. Therefore, if

the Mansfield Independent School District is compelled to receive the plaintiffs and those similarly situated for the school year 1956-57, no allotment will be available to the Mansfield Independent School District for the education of such plaintiffs and those similarly situated, and the Mansfield Independent School District will be compelled to sustain a substantial economic loss by reason thereof, and that this decree in all fairness to all parties should be stayed until the end of the school year 1956-57.

and for the further reason that Defendants verily believe that if given the year migration can be accomplished with justice for all -

Respectfully requested,

CANTEY, HANGER, JOHNSON,
SCARBOROUGH & GOOCH,

By

[Signature]

1500 Sinclair Bldg.
Fort Worth 2, Texas

Attorneys for Defendants.

The above and foregoing petition for stay of execution was this the 30 day of August, A. D. 1956, presented to the United States District Court for the Northern District of Texas and

such motion was by the Court *dismissed for want of jurisdiction, without prejudice to defendants right to present same to the Court of Appeals, or to the Supreme Court, or a Judge or Justice thereof.*

[Signature]
UNITED STATES DISTRICT JUDGE

order

Filed 30 day of August
1956 at 11:30 o'clock AM

GEO. W. PARKER, Clerk

By *[Signature]* Deputy

In the District Court of the
United States for the Northern
District of Texas, Fort Worth
Division

Nathaniel Jackson, a Minor, et al.

vs.

O. C. Rawdon, President of the
Board of Trustees of the Mansfield
Independent School District, et al.

PETITION FOR STAY OF ENFORCEMENT
OF DECREE

FILED 29 ^{Day of} August
19 56 ^{at} 3 25 ^{o'clock} M
GEO. W. PARKER, Clerk
By Kennecoe Flowers
Deputy

41
473