

*B.S.  
Florida  
McGill*

April 12, 1938

S. D. McGill, Esq.,  
610 West Duval Street,  
Jacksonville, Florida

Dear Mr. McGill:

I am sending you under separate cover copy of proposed draft of a memorandum brief in the teachers' salary case. I hope this will help you in preparing a brief in this case. I am not familiar with the practice in Florida and therefore do not know exactly how it should be placed in shape. In Maryland we have a certain definite rule as to Statement of Facts, Statement of Case and Argument. Please feel free to change anything in this brief and to add to it or subtract from it.

Please wire me as soon as the case is filed. Also write giving me the full particulars so that we can send out a press release from this office to the papers throughout the Country, both white and colored. As we send our releases out on Friday, we will need such particulars as the name of the Court, Judge, etc., not later than Thursday night or ten o'clock Friday morning.

I am sure you will be encouraged to know that in Maryland the County Superintendent and the State Board of Education have requested a legal opinion from the leading constitutional lawyers of the State and these lawyers are unanimous in their opinion that our cases will stand up in court and that there is no legal defense which can be made to them. Although these cases are cases of first impression it is encouraging to know that there are lawyers representing the other side who agree with us. Realizing that this is a case of first impression, it has been necessary to place in the brief a large collection of cases which we believe are relevant to the deciding of a case of first impression.

S. D. McGill

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I regret that I did not get this brief to you sooner, but it has been necessary for me to be in Maryland most of the time to completely straighten out matters there. We have run into one bad county and it is necessary for us to take advantage of every opportunity in this particular county.

Yours very truly,

Thurgood Marshall  
Assistant Special Counsel

TM:AG