

LAW OFFICES
McGILL & MCGILL
CITIZENS INSURANCE BUILDING
410 WEST DUVAL STREET P. O. Box 702
JACKSONVILLE, FLORIDA

December 8, 1939

Mr. Thurgood Marshall
Special Counsel NAACP
69 Fifth Avenue
New York, N.Y.

Dear Thurgood:

When I received the letter from your office last Wednesday I immediately forwarded the transcript by Air Mail in the Gilbert case. I gathered from the letter received that your office was then preparing the petition and memorandum brief to be filed with the transcript. I am inclosing you herewith a draft of the petition for writ of certiorari and request that you and Friend Ransom go over it and make any changes or any additions that you may see fit to. It has been hurriedly drawn since I received your telegram today. I would suggest that you go right ahead with your memorandum brief. I will also make a draft of the memorancum brief to be filed with the petition. I will send that by Air Mail in time for you or Ransom to have it in hand on Monday morning of next week.

Now in regards to paying the cost of printing the record and brief will state that I had understood from you in the beginning that when these cases were decided by the Supreme Court of Florida the NAACP would be in a position to carry it on. Nevertheless, if you are not in a position to do that I will guarantee the expenses in connection with it. The record will necessarily be small.

I hope you understand that I fully appreciate some of the weaknesses in connection with this case but we feel and my clients feel that an expression from the Supreme Court on this matter is bound to be of some help to us even if the writ of certiorari is denied. The reasoning of the court will be sure to help us. We mean to keep up the fight in these salary cases in Florida.

With every good wish, I am,

Respectfully yours,

S. D. McGill

S. D. MCGILL

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