

IN THE CHANCERY COURT OF GRENADA COUNTY, MISSISSIPPI

A. G. CORPORATION

COMPLAINANT

VS.

SOUTHERN CHRISTIAN LEADERSHIP  
CONFERENCE, INC., ET AL

DEFENDANTS

NO. 11,172

BILL OF COMPLAINT

Comes A. G. Corporation and complains of Southern Christian Leadership Conference, Inc., B & P Enterprizes, Grenada County Freedom Movement, Belle Flower Baptist Church, First New Hope Missionary Baptist Church, St. Vincent's Chapel, Hosea Williams, Leon Hall, R. B. Cottonreader, Jr., Alphonso Harris, the Reverend Andrew Young, J. T. Johnson, Bruce Hartford, James Bullock, Major (Brother Max) Wright, Robert Johnson, Robert Edward Johnson, Mary Payton, Toy Payton, Lewis Johnson, John Marshall Robertson, Eddie Robertson, Roosevelt Williamson, Irvin Montgomery, Chacey Montgomery, Willie Savage, Rev. Sharper T. Cunningham, Willie T. Allen, Matthew Bocclair, G. W. Wanso Bowdry, Bingham, J. D. Willis, John Teague, Ernest Neely, Tyree Trussell, Rev. C. C. Coleman, Collins Hurd, Lonnie Taylor, Courtney Brown, O. L. Ward, R. E. Fox, Della Fox, Roosevelt Moss, Dolphus Mitchell, Charles Weathers, Rev. L. E. Smith, Rev. B. A. Cameron, Rev. B. F. Patterson, Charles Hardimon, Annie Dell Lewis, Dunston Harkin, Richard Jackson, Crosby Watts, James Haskins, Wardell Tolliver, Dewitt Dunn, William Parker, Charlie Barksdale, George Williams, Marion Perry, John H. Neal, A. T. Bostick, C. H. Liddell, M. C. Quarles, H. L. Brown, R. L. May, Arthur Merrith, Walter Crowder, W. T. Hooker, Cal McNeil, Frank Crowder, Parolee Clark, U. S. Gillon, Willie

Williams; and Grenada Bank, Grenada <sup>Banking</sup> Trust and / Company, Coahoma  
County  
/Bank & Trust Company and the Bank of Clarksdale; and complainant  
would with respect show unto the Court the following:

1. The jurisdiction of the Chancery Court is predicated upon the following:

a. The Constitution and laws of the State of Mississippi, pertaining to chancery and equity jurisdiction.

b. The Mississippi chancery practice and procedure which have become established as belonging within equity jurisdiction.

c. That this is a suit to prevent a multiplicity of suits at law.

d. That this is a suit for attachments against non-residents owning land in this state and where there are effects of the non-residents in the hands of residents.

e. That this is a suit for injunction.

f. That the complainant has no plain, adequate and complete remedy at law.

g. That this is a suit to enforce the substantive equities of the complainant.

h. That this is a suit to afford the complainant relief for rights which are being withheld; and to redress wrongs done to the complainant, and those which are impendingly threatened to be done, and those wrongs which are continuing to be done.

i. That this is a suit to secure for complainant adequate and proper compensation because of the wrongs of the defendants, acting in combination, concert, individually and jointly and severally for:

(1) Conspiracy, (2) Boycott, (3) Interference, and (4) Restraint of trade.

## II.

1. The complainant is the A. G. Corporation, organized and existing under and by virtue of the Constitution and laws of the State of Mississippi. The complainant at all times material hereto and for many years prior to the filing of this action was and is engaged in retail grocery business. Complainant purchases from wholesale establishments and others a large variety of food, food products and staples, which it in turn sells and offers for sale to customers and consumers. The business of the complainant is now, and has been for many years prior to the filing of this action, located on Main Street in the east side of the public square in the City of Grenada, Mississippi, and in the heart of the business district of the said City of Grenada. The complainant at the present time does business under the trade name of PAK'N SAK.

2. The non-resident defendants are:

a. Southern Christian Leadership Conference, Inc., hereinafter referred to as SCLC. Complainant is informed and believes that the defendant SCLC is a corporation organized and existing under and by virtue of the laws of the State of Georgia; that the headquarters of said defendant corporation is located in Atlanta, Georgia; that said corporation is engaged in the business of, but not limited to, the organization of demonstrations among negro citizens in the various states of the Union; and for the purpose of collecting funds from contributions from various and sundry persons; and for the purpose of organizing cooperative wholesale and retail establishments for the purchase and sale of various and sundry commodities, foods and staples to customers and consumers in the various and sundry cities and communities throughout the United States. The said defendant SCLC has not and is not qualified to do business in the State of Mississippi; but

that notwithstanding the failure of said non-resident corporate defendant to qualify to do business pursuant to the laws of the State of Mississippi, the said SCLC is in fact doing business in the State of Mississippi, and in the County of Grenada, where the said non-resident corporate defendant has agents, officers, servants and employees in the County and City of Grenada, and who may be served with process. Said officers, agents, servants and employees will be more fully set forth hereinafter. That service of process may also be had upon the Secretary of State of Mississippi, pursuant to Sections 1437 and 1438 of the Mississippi 1942 Code.

b. The B & P Enterprizes is a subsidiary and division of SCLC; and that said subsidiary is charged with the building and construction of wholesale and retail establishments for the purchase and sale of commodities, personal property, food and staples; and the same is operated in conjunction with and as a part of SCLC; and the headquarters of said B & P Enterprizes is located in Atlanta, Georgia, in the office of SCLC.

c. Each of the individual defendants named in this subparagraph is an adult resident citizen of the State of Georgia; each of said individual defendants is an employee, agent, officer and servant of the non-resident corporate defendant, SCLC; each of said individual defendants either has been or is now present and working in the County and City of Grenada, Mississippi; each of said individual defendants named in this subparagraph, at all times mentioned in this bill of complaint, was acting and working and is now working within the course and scope of his respective employment with SCLC, and in the furtherance of the business of SCLC; and that at all times material hereto SCLC ratified and ratifies each and every act of said individual defendants; each of said individual defendants may be served with process in the



County and City of Grenada, Mississippi; or they may be served by serving process upon the Secretary of State of the State of Mississippi, pursuant to said Code Sections 1437 and 1438; and the said individual defendants are named as follows: (1) Hosea Williams, Grenada Project Director; (2) Leon Hall, Field Worker; (3) R. B. Cottonreader, Jr., Field Worker; (4) Alphonso Harris, Field Worker; (5) The Reverend Andrew Young, Field Worker; (6) J. T. Johnson, Field Worker; and Major (Brother Max) Wright.

d. Each of the individual defendants named in this subparagraph is an adult resident citizen of the state set opposite his respective name; each of said individual defendants is an employee, agent, officer and servant of the non-resident corporate defendant, SCLC; / : that each of said individual defendants was and is, at all times material in this bill of complaint, acting and working within the course and scope of his employment with said SCLC, and that all of said acts of said defendants were in the furtherance of the business of SCLC and ratified by said SCLC; and that said individual defendants may be served with process in the County and City of Grenada; or they may be served by serving the Secretary of the State of Mississippi pursuant to said Code Sections 1437 and 1438; and said individual defendants are named as follows: (1) Bruce Hartford, California; and (2) James Bullock, New Jersey.

3. The resident defendants are:

a. Each of the individual defendants named in this subparagraph is an adult resident citizen of Grenada County, Mississippi; each of said individual defendants was and is working in concert with and under the direction of the agents, officers, officials, servants and employees of said SCLC at all times material to and mentioned in this bill of complaint; and each of said individual defendants may be served with process in the County

and City of Grenada; and said individual defendants are named as follows: Robert Johnson, Mary Payton, Toy Payton, U. S. Gillon, John Marshall Robertson, Eddie Robertson, Roosevelt Williamson, Irvin Montgomery, Chacey Montgomery, Willie T. Allen, Matthew Boclair, G. W. Bingham, J. D. Willis, Wanso Bowdry, John Teague, Earnest Neely, Tyree Trussell, Calvin Hurd, Lonnie Taylor, Courtney Brown, O. L. Ward, the Reverend C. C. Coleman, R. E. Fox, Della Fox, Roosevelt Moss, Dolphus Mitchell, Charles Weathers, the Reverend L. E. Smith, the Reverend B. A. Cameron, Charles Hardimon, Willie Williams and Annie Dell Lewis.

b. Each of the individual defendants named in this subparagraph are minor residents of Grenada County, Mississippi, who may be served with process by service upon each of said minor defendants and by service upon a parent of each of said minor defendants, said individual minor defendants being named as follows: Robert Edward Johnson and Lewis Johnson.

c. Each of the individual defendants named in this subparagraph is sued individually and as the representative of a class, too numerous to name herein and to bring before this Court; and the said individual defendants named herein are also sued as the representatives of the unincorporated association of individuals known as the Belle Flower Baptist Church; the said individual defendants set forth in this subparagraph are adult resident citizens of Grenada County, and are listed as deacons of the said Belle Flower Baptist Church, as follows: George Williams, John H. Neal and Lonnie Taylor; and as trustees of the said Belle Flower Baptist Church, as follows: A. T. Bostick, C. H. Liddell, L. E. Smith, Marion Perry, M. C. Quarles, H. L. Brown, R. L. May, Arthur Merrith, Walter Crowder, W. T. Hooker, Cal McNeil, Frank Crowder and Parolee Clark; and each and every other member of the class who are members of the Belle Flower Baptist Church,

and whose names are unknown to the complainant, and who are too numerous to bring before this Court.

d. Each of the individual defendants named in this subparagraph is sued individually and as the representative of a class, too numerous to name herein and to be brought before this Court; said individuals are sued as the representatives of the unincorporated association of individuals known as First New Hope Missionary Baptist Church; and said individuals set forth in this subparagraph are adult resident citizens of Grenada County and are listed as trustees of the said First New Hope Missionary Baptist Church, as follows: Dunston Harkins, Richard Jackson, Crosby Watts, James Haskins, Wardell Tolliver, Dewitt Dunn, William Parker and Charlie Barksdale; and each and every other member of the First New Hope Missionary Baptist Church whose names are unknown to complainant, and who are too numerous to bring before this Court.

e. The individual defendant named in this subparagraph is sued individually and as the representative of a class too numerous to bring before this Court; the Reverend B. F. Patterson is an adult resident citizen of Grenada County and is sued individually and as the representative of the unincorporated association of individuals known as St. Vincent's Chapel; the Reverend B. F. Patterson is the pastor of said chapel; and each and every member of said chapel whose names are unknown to complainant and who are too numerous to bring before this Court.

f. The individual defendants named in this subparagraph are adult resident citizens of Grenada County and are sued individually and as representatives of a class too numerous to bring before this Court; the Reverend Sharper T. Cunningham, Willie Savage and O. L. Ward are sued individually and as representatives of the unincorporated association of individuals known as the Grenada County Freedom Movement; the individual defendants named

in this subparagraph are members of and the leaders of said unincorporated association, which is an arm or chapter of said SCLC. The complainant is informed and believes that said unincorporated association has been issued a charter by said SCLC as a part of said SCLC.

g. The complainant is informed and believes that the banks set forth in this subparagraph have in their respective hands funds, property and effects of the non-resident, absent or absconding defendants; and said banking institutions are named herein as attachment defendants and they are as follows: Grenada Bank, Grenada Trust and Banking Company, both of which are located in the County and City of Grenada where they each have officers and agents upon whom service of process may be had; and the Coahoma County Bank and Trust Company and the Bank of Clarksdale, both of which are located within the County of Coahoma and the City of Clarksdale where they each have officers and agents upon whom service of process may be had.

4. The complainant brings suit against each individual named in the bill of complaint; and against each of the individuals whose names are unknown to complainant but who are included herein as a class.

### III.

1. The complainant charges that beginning on or about July 5, 1966, and continuing daily thereafter each, every and all of the defendants, corporate, unincorporated associations and individual defendants, hereinbefore set forth, combined and entered into an agreement and conspiracy, with a unity of design and purpose and a preconceived plan, the malicious and unlawful object of which was to ruin and cause injury to the business of the complainant and others; that said defendants did not enter into said conspiracy and combination for the purpose of protecting or advancing



ing any legitimate interests of their own; and that said act constituted an unlawful conspiracy.

2. The complainant charges that the means employed by the defendants, and each of them in carrying out and to effect the purpose of the illegal and unlawful combination, plan, scheme and conspiracy, was and is likewise malicious, illegal and unlawful; that the defendants have since July 5, 1966, daily engaged in and committed malicious, illegal and unlawful acts of injurious falsehoods, deception, force, intimidation, threats, coercion and violence against the customers and prospective customers of the complainant.

3. The complainant charges that in pursuance of the aforesaid conspiracy to injure the business of complainant and others, that the defendants and each of them executed and are continuing to carry out said malicious, illegal and unlawful plan and scheme to his great damage; and that said conspiracy on the part of all and each of said defendants was induced in malice toward the complainant and was and is without justification or lawful purpose; and that its objects as aforesaid have been and are being accomplished by illegal means and in an unlawful manner.

4. The complainant charges that on or about July 5, 1966, and daily thereafter, the defendants and each of them entered into an unlawful combination among themselves and others who are unknown to complainant to illegally bring about a secondary boycott to the business of the complainant and others with the intent and purpose of causing loss to the complainant and others by coercing the customers and prospective customers, against their will, to withdraw and withhold their beneficial business intercourse from the complainant by the infliction of physical injury to said customers and prospective customers on their person and property; by the threat of physical injury; by intimidation so

as to put said customers and prospective customers in fear of such injury; through the fear of incurring the displeasure, persecution and vengeance of said combination; and by threats to said customers and prospective customers that unless they withdrew or withheld their beneficial business intercourse from the complainant and others against whom the conspiracy, combination and concert of action is directed, that said combination would cause injury to said customers in their person, property and business. Complainant further charges that by the use of threats, intimidation, and coercion, the said defendants intended to overcome and did overcome the will of customers and prospective customers of the complainant, and by such unlawful and illegal means, intended to and did compel said customers to refrain from trading with the complainant. Complainant further charges that said defendants committed acts and spoke words to said customers and prospective customers of complainant that caused them to fear for their lives and safety; and that they were in such apprehension of damage that said customers were and are so influenced thereby as to prevent them from freely trading with complainant as said customers so desire to do; and that the complainant asserts that it at no time material hereto had any dispute, disagreement or controversy with any of the defendants herein or the combination thereof. Complainant further charges that the said illegal secondary boycott was and is an unlawful invasion of his property rights; that complainant has been caused to suffer great harm and damage as a result thereof; and that complainant, because of said malicious attempt to irreparably injure it, without purpose, by said secondary boycott, is entitled to recover damages jointly and severally from said defendants.

5. The complainant charges that after July 5, 1966, when said unlawful conspiracy was formed, the defendants daily

committed and are continuing to commit the following unlawful and overt acts against the complainant and others:

a. Sent mass pickets, carrying signs charging the complainant and others with being unfair, to parade around the public square.

b. Made public speeches against trading with the complainant and others.

c. Stationed guards in the vicinity of complainant's place of business; and said guards physically stopped the customers and prospective customers from entering the premises of the complainant, and threatened and coerced said customers with physical violence if they traded with the complainant.

d. Threatened to brand the customers and prospective customers of complainant as traitors to the defendants; and referred to said customers in other offensive, abusive and insulting terms.

e. Threatened to destroy all of the property and goods of customers and prospective customers if they made any purchases from the business establishment of the complainant and others.

f. Violently, against the will of certain customers, certain of said defendants acting for the combination took from said customers the personal property which had been purchased from the complainant and others and destroyed said property.

g. Vilified, slandered, abused and intimidated the customers and prospective customers of the complainant when said customers did not forthwith agree to comply with their demands.

h. Physically attacked certain customers of the complainant and others in order to enforce the illegal secondary boycott against the complainant and others.

i. Certain of the defendants, members of the unlawful conspiracy and combination, in order to enforce and carry out

the illegal secondary boycott, and to unlawfully interfere with the business of the complainant and others, pointed and aimed deadly weapons at said customers of the complainant and others, and threatened to kill said customers if they did not cease trading with the complainant and others.

j. Certain of the defendants called at the homes of certain of the customers and prospective customers and maliciously sought to induce and did induce said customers not to trade with the complainant and others by threats and coercion.

k. Certain of the defendants who are engaged in the taxi business in and around the City of Grenada refused and continue to refuse to transport customers and prospective customers to the vicinity of the place of business of the complainant, in an effort to destroy the business of complainant; and said taxi operators threatened said customers and prospective customers with physical violence if said customers traded with complainant and others.

6. The complainant, as aforesaid herein, began the operation of the retail grocery business in June, 1956, in the City of Grenada. Complainant purchased groceries and other articles for resale to purchasers, and for many years sold at retail said commodities to said customers in and around Grenada. The complainant built up a large and profitable business, and had many customers who purchased the articles and commodities from it; and complainant gained the good will of virtually all of the customers and prospective customers in and around the community for many years until July 5, 1966, when the said illegal conspiracy of the defendants began and is continuing to be carried out. The defendants, as aforesaid, intending to destroy the business of the complainant because said business was located in the public square of the City of Grenada, and because the President



of said corporate complainant was of the white or Caucasian race, wilfully and unlawfully, by force, violence, threats, intimidation and coercion caused and continues to cause the customers and prospective customers to cease doing business with the complainant. The actions of the defendants in this regard, by their agents, servants and confederates, were done for no justifiable purpose; but were done wrongfully and maliciously to cause loss to the complainant and others, and<sup>to</sup> injure the business of the complainant; to prevent the complainant from selling articles and commodities to its customers; and for said reason the complainant has been and continues to be unable to sell to its customers and prospective customers who are ready, willing and able to purchase from complainant. Complainant further charges that the defendants, and each of them, did maliciously conspire to publish and did publish to each other and to all members of the combination, and others unknown to the complainant, false, fraudulent information concerning the complainant to the effect that complainant had refused to sell commodities and articles to the members of said SCLC and that complainant was biased and prejudiced against the members of SCLC.

7. That by reason of the said conspiracy, illegal secondary boycott and malicious conduct of the defendants, the complainant has been caused to suffer great and irreparable harm and damage in the loss of gross income in the amount of \$66,318.00, together with the loss of good will in the sum of \$100,000.00, and the loss of future income in the sum of \$795,816.00; all in the total sum of \$962,134.00.

#### IV.

1. The complainant charges the defendants, individually and collectively, with the tortious interference of its right to pursue the lawful trade and business of a retail grocery establish-

ment in Grenada, by the use of threats, force, coercion, fraud, defamation, false representation and intimidation for the purpose of preventing people, customers and prospective customers from trading with it.

2. The complainant reiterates by reference in order to avoid repetition all of the allegations set forth hereinbefore in support of the charges of interference with complainant's business relations with its customers.

3. Complainant charges that the interference of the defendants with its said business relationship was and is wholly without justification or legal excuse; nor were said acts of interference on the part of said defendants made and done in the exercise of any absolute rights of said defendants.

4. Complainant charges that said acts on the part of the defendants complained of herein were malicious, wilful, intentional, and they were calculated to cause and did cause great harm and damage to the complainant in its said business; and that said acts were done with the unlawful purpose of causing complainant damage and loss, without right of justifiable cause on the part of the defendants; and that the complainant was caused suffer great harm and actual damage as set forth hereinbefore; and that said damages sustained by the complainant were and are a natural and proximate consequence of said wilful interference on the part of said defendants. Complainant further charges that, because of the said unlawful interference on the part of the defendants, complainant was caused to suffer the loss of customers, good will, past, present and future earnings, and the value of its business, all in the total amount of \$962,134.00.

V.

1. Complainant charges the defendants herein combined and conspired to commit and did commit illegal and unlawful acts

public policy of the State of Mississippi as set forth hereinbefore.

5. For said wrongs complainant asks for the damages and penalties pursuant to Code Section 1092, all in the total sum of \$962,134.00.

#### VI.

1. Pursuant to Code Sections 2729, et seq., complainant asks that the lands, funds, property and effects of the non-resident defendants, as set forth hereinbefore, be attached and held to await the decrees and orders of this Court.

2. Complainant is informed and believes that the non-resident defendant, B & P Enterprizes, a division and subsidiary of SCLC, owns real property in Grenada County described as follows:

a. Lots numbered 254, 255, 256, 257 and 258, East Ward, Grenada, Grenada County, Mississippi.

3. Complainant asks that said real property be attached according to law.

4. Complainant is informed and believes that the non-resident defendants have funds, property and effects in the Grenada Bank, Grenada Trust and Banking Company, in Grenada, Mississippi; and in the Coahoma County Bank and Trust Company and the Bank of Clarksdale, both in Clarksdale, Mississippi; and complainant asks that said funds, property and effects of said non-resident defendants be attached. Complainant is further informed and believes that unless prevented by the process of this Court said banking institutions will presently turn over and remit all of said effects, property and funds to said non-resident defendants and the same will be removed out of the State of Mississippi and beyond the jurisdiction of this Court.

## VII.

1. Complainant, based upon the facts set forth in this bill of complaint, prays for a prohibitory temporary injunction to be issued for the reason that the property and rights of the complainant are involved and being interfered with; that the injury to the complainant is substantial as shown by the facts set forth hereinbefore; that such injury to the complainant is real and irreparable; and that the illegal, unlawful and harmful acts of the defendants will continue to occur unless enjoined by the Court; and the complainant has no plain, adequate, efficient and speedy remedy at law, that the situation is so acute as to permit no delay and due to the emergency created by the said acts and conduct of the defendants and the continuing irreparable injury and damage to the complainant, said injunction should be granted and issued without notice and without requiring a hearing before the issuance of the same.

2. Complainant would show that the defendants, and each of them, corporate, unincorporated, association, individual, known and unknown, and as a class, and all of those confederating with, aiding and assisting said defendants should be enjoined and prohibited from: (1) Picketing in or about the premises of the complainant; (2) stationing guards at or near the vicinity of the premises of the complainant; (3) soliciting, advising, threatening, coercing and constraining any person from trading with the complainant; (4) interfering with the business of the complainant; (5) boycotting the business of the complainant; (6) asking or demanding that others cease doing business with the complainant; (7) committing acts in restraint of trade and/or in violation of the laws of the State of Mississippi thereunto appertaining.



VIII.

1. For the wrongs, injuries, loss and damage done to the complainant by the defendants, individually and collectively, the complainant would show that it has suffered damages in the total sum of \$962,134.00, that said defendants are jointly and severally liable for said damage to the complainant.

PRAYER

WHEREFORE, PREMISES CONSIDERED, complainant prays as follows:

1.

That the funds, property and effects of the non-resident defendants, Southern Christian Leadership Conference, Inc., B & P Enterprizes, Hosea Williams, Leon Hall, R. B. Cottonreader, Alphonso Harris; the Reverend Andrew Young, J. T. Johnson, Major (Brother Max) Wright, Bruce Hartford and James Bullock, in the hands of and under the control of the resident defendants, the Grenada Bank, the Grenada Trust and Banking Company, the Coahoma County Bank and Trust Company, and the Bank of Clarksdale, be attached and that said herein named resident defendants be summoned personally in the manner provided by law in cases of attachment in chancery, returnable to the next regular term of this Court; and that the herein named non-resident defendants be served by serving process upon the Secretary of State of the State of Mississippi, in the manner provided by law; and that process be served upon said individual non-resident defendants and upon the officers, agents and servants of said non-resident defendants, Christian Southern/Leadership Conference, Inc., and the said B & P Enterprizes, if to be found in said county; and that the real property owned by the non-resident defendant, B & P Enterprizes, be attached as provided by law in cases of attachment in chancery; and that all other resident defendants be summoned personally; so that all

of said resident and said non-resident defendants may be required to appear at the next regular term of this Honorable Court, then and there to answer this bill of complaint, and that the answer of all of said defendants except the herein named resident defendant banks shall not be under oath, answer under oath being hereby expressly waived, except as to the answer of said resident defendant banks.

2.

That upon presentation of this bill of complaint, except as to the resident defendants Grenada Bank, Grenada Trust and Banking Company, Coahoma County Bank and Trust Company and the Bank of Clarksdale, a temporary injunction issue enjoining and prohibiting the defendants, and each of them, and all members of the incorporated and unincorporated defendant organizations, and all persons confederating with, aiding and assisting the defendants in the acts herein complained of, from committing any of the following acts, directly or indirectly, through any person, firm, corporation or association: (1) Picketing in or about the premises of the complainant, known as the PAK'N SAK; (2) stationing guards at or near the vicinity of the said premises of the complainant; (3) soliciting, advising, threatening, coercing and constraining any person from trading with the complainant; (4) interfering with the business of the complainant; boycotting the business of the complainant; (6) asking or demanding that others cease doing business with the complainant; (7) committing acts in restraint of trade and/or in violation of the laws of the State of Mississippi thereunto appertaining.

3.

That upon a final hearing of this cause complainant may have a decree against the said non-resident defendants and the resident defendants, except said resident defendant banks

said corporation, and that the matters and facts set forth as true in the foregoing bill of complaint are true and correct as therein stated, and as to those matters alleged on information and belief he verily believes the same to be true.

/s/ Gilbert L. Allen  
Gilbert Allen

Sworn to and subscribed before me, this the 27<sup>th</sup> day of September, 1966.

/s/ Carl C. Bastie  
Notary Public

My Commission Expires:

August 25, 1969

IN THE CHANCERY COURT OF GRENADA COUNTY, MISSISSIPPI

A. G. CORPORATION

COMPLAINANT

VS.

SOUTHERN CHRISTIAN LEADERSHIP  
CONFERENCE, INC., ET AL

DEFENDANTS

NO. ~~mis~~ 22

11,172

FIAT

TO THE CHANCERY CLERK OF GRENADA COUNTY, MISSISSIPPI:

Upon the filing of the bill of complaint in the  
above styled and numbered cause, you are hereby directed to  
issue the temporary injunction as prayed for in said bill of  
complaint, <sup>*except the printing as permitted by Federal Court order*</sup> upon the complainant, A. G. Corporation, entering  
into bond in the sum of \$1000.00 Dollars, con-  
ditioned as provided by law, with good and sufficient sureties,  
to be approved by you.

ORDERD, this the 27<sup>th</sup> day of September, 1966.

/s/ Neville Patterson