

IN THE UNITED STATES COURT OF APPEALS
FOR THE FIFTH CIRCUIT

NO. 15,927

U. S. COURT OF APPEALS
FILED

SEP 5 1956

John A. Feehan, Jr.
CLERK

(Civil Action No. 3152, United States
District Court for the Northern District
of Texas, Fort Worth Division.)

NATHANIEL JACKSON, A Minor, by His
Father and Next Friend, W. D. Jackson,
et al,

Appellants,

VS.

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

Appellees.

PETITION TO STAY THE EXECUTION AND
ENFORCEMENT OF THE JUDGMENT OF THE
UNITED STATES COURT OF APPEALS FOR
THE FIFTH CIRCUIT; TO STAY THE MAN-
DATE ISSUED BY THE UNITED STATES
COURT OF APPEALS FOR THE FIFTH
CIRCUIT UNDER DATE OF AUGUST 17,
1956, AND TO STAY THE ENFORCEMENT OF
THE JUDGMENT OF THE LOWER COURT IN
CONFORMITY WITH SUCH MANDATE DATED
AUGUST 27, 1956, IN ORDER TO OBTAIN
A WRIT OF ERROR FROM THE SUPREME
COURT OF THE UNITED STATES.

TO THE HONORABLE UNITED STATES COURT OF APPEALS FOR THE
FIFTH CIRCUIT:

Come now O. C. RAWDON et al, who are appellees in the
above entitled and numbered cause, feeling that the judgment of
the lower Court was correct in every respect in connection with
the matter at issue herein, and respectfully petitions that the
execution and enforcement of the judgment of the United States
Court of Appeals for the Fifth Circuit, reversing and remanding
with instructions the judgment of the lower court, the mandate of
the United States Court of Appeals for the Fifth Circuit issued on
August 17, 1956, and the judgment of the lower court in obedience

to such mandate entered August 27, 1956, be stayed for a reasonable time to enable the parties aggrieved to obtain a writ of certiorari from the Supreme Court of the United States. Provision for the granting of the relief herein sought is found in Title 28, Section 2101, United States Code Annotated.

Petitioners herein further state that in the event a stay is granted, they will, as soon as possible, and within the time allowed by the rules, file a petition for writ of certiorari to the Supreme Court of the United States.

Petitioners herein, who were defendants in the court below, stand ready, able and willing to give such security as is directed by this Court.

Petitioners herein verily and sincerely believe that the judgment of the trial court was correct; that the judgment of the Court of Appeals was incorrect and that the judgment of the lower court is consistent with the controlling decisions in this matter as rendered by the Supreme Court of the United States, and that this appeal is not for delay, but in order that justice may be done.

CANTEY, HANGER, JOHNSON,
SCARBOROUGH & GOOCH

By



J. A. Gooch
1500 Sinclair Building
Fort Worth 2, Texas

Attorneys for Appellees.

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Appellants,

VS.

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the Board of Trustees of the
Mansfield Independent School
District, et al,

Appellees.

PETITION TO STAY ENFORCEMENT
OF JUDGMENT