

THE BRIEF LIFE AND ENDURING PROMISE OF CIVIL RIGHTS REMOVAL

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The Reconstruction Congress provided for civil rights removal jurisdiction to enable a state-court defendant with defenses based on federal civil rights to remove the case against them to federal court. A series of late nineteenth-century Supreme Court decisions rendered the provision practically useless until Congress invited federal courts to reinterpret the statute in the Civil Rights Act of 1964. New archival research reveals how lawyers at the forefront of the Civil Rights Movement immediately embraced the tool, now codified at 28 U.S.C. § 1443, to shift from state to federal court thousands of cases brought against demonstrators and local residents seeking to exercise their federal civil rights. That brief moment came to an end when the Supreme Court reaffirmed its narrow view of the provision just two years later, and the statute has remained mostly dormant ever since.

This Note argues that the utility of civil rights removal, as revealed in the overlooked story of its use during the Civil Rights Movement, should be restored through a modernized statute that clearly defines removal's role in shifting the power over forum choice to defendants when other forms of relief and review are inadequate to address the potential for bias against those raising civil rights defenses. It includes an analysis of court records for almost 5,000 criminal cases filed in federal courts in Mississippi from 1961 through 1969, including almost 1,200 cases removed from Mississippi state courts between 1964 and 1966.

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INTRODUCTION

Summer 1964 was a season of organizing, education, and bloodshed in Mississippi.¹ As students, attorneys, and activists descended on the state to aid Black Mississippians in their fight to exercise their federally guaranteed rights amid violent state opposition, civil rights lawyers embraced an obscure procedural tool—the civil rights removal statute—to successfully

1. See Doug McAdam, *Freedom Summer 4* (1988) (describing the efforts of more than a thousand young local activists and volunteers from the North to register Black voters and provide educational lessons in Freedom Schools—as well as the violence that plagued their activism). For additional background on Freedom Summer, see generally Seth Cagin & Philip Dray, *We Are Not Afraid: The Story of Goodman, Schwerner, and Chaney and the Civil Rights Campaign for Mississippi* (1988) (providing a detailed account of the abductions and murders of Freedom Summer volunteers Andrew Goodman, Michael Schwerner, and James Chaney at the hands of local government officials and the Ku Klux Klan as well as the federal prosecution that followed); Charles M. Payne, *I’ve Got the Light of Freedom: The Organizing Tradition and the Mississippi Freedom Struggle* (1995) (examining the community organizing tradition of Black activism in Mississippi throughout the 1960s, including during Freedom Summer).

rescue thousands of litigants from the state's prejudiced justice system. That phenomenon, often overlooked in the story of Freedom Summer, is central to understanding the roles of and relationship between the state and federal courts during the height of the Civil Rights Movement as well as that relationship's impact on the recognition of federal civil rights claims.

Passed by the Reconstruction Congress amid its broad expansion of federal jurisdiction, civil rights removal enables a defendant in state court with defenses based on federal civil rights to remove the case against them—civil or criminal—to federal court.² The statute, currently codified at 28 U.S.C. § 1443,³ was drastically narrowed by the Supreme Court in a series of late nineteenth-century decisions that rendered the provision practically useless.⁴ Congress took steps to revitalize it nearly a century later in the Civil Rights Act of 1964,⁵ and lawyers at the forefront of the Civil Rights Movement immediately employed the tool to strategically shift from state to federal court thousands of cases brought mostly in southern states against local residents and demonstrators seeking to exercise federal civil rights.⁶ But just two years later, the Supreme Court once again narrowed the provision, and it has remained mostly dormant ever since.⁷

The story of that brief moment of procedural innovation reveals civil rights removal's underrealized utility as a forum choice device for situations in which other forms of relief and review are inadequate to address potential procedural and judicial biases against people raising civil rights defenses. In the 1960s, when defendants and their lawyers saw no hope for justice in southern state court systems or *ex post* federal review, they embraced the choice provided by civil rights removal to shift massive numbers of cases to federal district courts.⁸ Were that choice available to defendants today, the decision to remove would not be so obvious because

2. See *infra* section I.A.

3. The full text of the current civil rights removal statute reads:

Any of the following civil actions or criminal prosecutions, commenced in a State court may be removed by the defendant to the district court of the United States for the district and division embracing the place wherein it is pending:

(1) Against any person who is denied or cannot enforce in the courts of such State a right under any law providing for the equal civil rights of citizens of the United States, or of all persons within the jurisdiction thereof;

(2) For any act under color of authority derived from any law providing for equal rights, or for refusing to do any act on the ground that it would be inconsistent with such law.

28 U.S.C. § 1443 (2018).

4. See *infra* section I.B.

5. See *infra* section II.A.

6. See *infra* section II.B.

7. See *infra* section II.C.

8. See *infra* section II.B.

contemporary prejudices against those seeking to exercise individual rights are now more subtle and dispersed, including across the state and federal judiciary.⁹ But since hidden biases are harder to detect—and thus harder to remedy—in individual civil rights cases, it is all the more important in these circumstances to empower defendants—who are best positioned to determine which forum is most likely to grant them a fair hearing—with the choice to remove.

This Note argues that the utility of civil rights removal, as revealed in the overlooked story of its use during the Civil Rights Movement, should be restored through a modernized statute that clearly defines removal's role in shifting the power over forum choice to defendants when there is a risk of bias against recognizing federal rights.¹⁰ Part I surveys the origin and judicial limitation of civil rights removal during the Reconstruction era. Part II uncovers the practical role of civil rights removal during the brief period between its resurrection by Congress in 1964 and its second judicial restriction in 1966; it includes a close examination of how civil rights lawyers employed the tool in Mississippi, drawing from a review of the original case files for almost 5,000 criminal cases filed in federal district courts—including more than 1,200 cases removed from Mississippi state courts—during the 1960s.¹¹ Finally, Part III characterizes civil rights removal's proper role in the federal system and imagines how a revitalized statute might fulfill that function in modern times.

I. THE RECONSTRUCTION ERA: AN EQUITABLE AIM QUICKLY LIMITED

Federal courts have jurisdiction over a limited set of cases as prescribed by the U.S. Constitution and federal statutes.¹² Congress has provided for removal—the procedure by which a defendant may transfer a case from a state trial court to a federal district court—since the creation of lower federal courts in the Judiciary Act of 1789, and it is “regularly classified as one of the bases for federal court subject-matter jurisdiction.”¹³ While removal was originally available only to nonresident

9. See *infra* Part III.

10. See *infra* section III.B.

11. The Appendix to this Note provides docket information for the criminal cases removed from Mississippi state courts from 1961 through 1969. See *infra* Appendix A.

12. See U.S. Const. art. III, § 2 (extending the judicial power to “all Cases, in Law and Equity, arising under this Constitution, the Laws of the United States, and Treaties” as well as all cases “between Citizens of different States”); Judiciary Act of 1789, ch. 20, § 11, 1 Stat. 73, 78 (conferring diversity jurisdiction on the federal courts); *Hertz Corp. v. Friend*, 559 U.S. 77, 84 (2010) (noting that Article III’s language “does not automatically confer . . . jurisdiction upon the federal courts” but rather “authorizes Congress to do so and, in doing so, to determine the scope of the federal courts’ jurisdiction within constitutional limits”).

13. Debra Lyn Bassett & Rex R. Perschbacher, *The Roots of Removal*, 77 *Brook. L. Rev.* 1, 2 (2011); see also Judiciary Act of 1789 § 12, 1 Stat. at 79–80 (providing for removal);

defendants in diversity suits¹⁴ and later extended to federal customs and revenue officers,¹⁵ today almost any defendant in a civil action over which state and federal courts have concurrent jurisdiction may effect removal by filing a petition in the federal court to which removal is sought, which automatically strips the state court of jurisdiction and stays the state proceeding unless the federal court remands the case.¹⁶ This mechanism was designed from the beginning to “allow certain types of parties to whom state courts might not give a fair shake a chance to get into a federal forum.”¹⁷

The most notable expansion of removal jurisdiction took place during and after the Civil War, when Congress vastly broadened federal jurisdiction—especially as to the enforcement of civil rights¹⁸—and with it the federal system’s dominance over state courts.¹⁹ One form of that

Anthony G. Amsterdam, *Criminal Prosecutions Affecting Federally Guaranteed Civil Rights: Federal Removal and Habeas Corpus Jurisdiction to Abort State Court Trial*, 113 U. Pa. L. Rev. 793, 842 n.195 (1965) [hereinafter Amsterdam, *Federal Removal*] (defining removal). This despite the Constitution saying nothing about removal. See *Martin v. Hunter’s Lessee*, 14 U.S. (1 Wheat.) 304, 349 (1816) (“This power of removal is not to be found in express terms in any part of the constitution . . .”).

14. See Judiciary Act of 1789 § 12, 1 Stat. at 79–80; William M. Wiecek, *The Reconstruction of Federal Judicial Power, 1863–1875*, 13 Am. J. Legal Hist. 333, 336–37 (1969).

15. See Force Bill, ch. 57, § 3, 4 Stat. 632, 633–34 (1833) (revenue officers); Act of Feb. 4, 1815, ch. 31, § 8, 3 Stat. 195, 198–99 (customs officers); see also Wiecek, *supra* note 14, at 337 (describing these statutes). Further development of federal removal jurisdiction in the nineteenth century is outlined in part below, see *infra* notes 20–21, 31–40, and accompanying text; it is examined in detail elsewhere, see Stanley I. Kutler, *Judicial Power and Reconstruction Politics* 143–60 (1968); Wiecek, *supra* note 14, at 338–42.

16. See 28 U.S.C. §§ 1441, 1446–1447 (2018); Amsterdam, *Federal Removal*, *supra* note 13, at 845 n.211, 858 n.246; Bassett & Perschbacher, *supra* note 13, at 5. The most common exception to this rule involves civil actions (1) brought against resident defendants and (2) removable solely based on diversity jurisdiction. See 28 U.S.C. § 1441(b)(2).

17. Benno C. Schmidt, Jr., *Juries, Jurisdiction, and Race Discrimination: The Lost Promise of *Strauder v. West Virginia**, 61 Tex. L. Rev. 1401, 1429–30 (1983). Modern legislation and scholarship recognize additional purposes for removal. See, e.g., Saurabh Vishnubhakat, *Pre-Service Removal in the Forum Defendant’s Arsenal*, 47 Gonz. L. Rev. 147, 151 (2011) (highlighting congressional action on removal since 1976 that addresses concerns such as cost, delay, and the types of disputes resolved by federal courts). Bias is also a widely accepted justification for diversity jurisdiction. See, e.g., *Erie R.R. v. Tompkins*, 304 U.S. 64, 74 (1938) (“Diversity of citizenship jurisdiction was conferred in order to prevent apprehended discrimination in state courts against those not citizens of the State.”).

18. See Robert J. Kaczorowski, *The Politics of Judicial Interpretation: The Federal Courts, Department of Justice, and Civil Rights, 1866–1876*, at 1, 3–4, 20 (Fordham Univ. Press 2005) (1985).

19. See Kutler, *supra* note 15, at 143 (describing removal as “[t]he most far-reaching example” of the Reconstruction Congress’s expansion of federal jurisdiction); Michael G. Collins, *The Unhappy History of Federal Question Removal*, 71 Iowa L. Rev. 717, 720 (1986) (noting that the vesting of general federal question jurisdiction in the lower federal courts in 1875 “was part of a larger substantive law and jurisdictional revolution that was an outgrowth of the Civil War and Reconstruction”); see also *Jurisdiction and Removal Act of 1875*, ch. 137, §§ 1–2, 18 Stat. 470, 470–71 (giving lower federal courts original jurisdiction over federal question suits and enabling removal on that basis).

expansion was Congress's extension of removal to federal officers in nearly all civil and criminal actions arising out of their official acts.²⁰ Another, in the Civil Rights Act of 1866, extended removal to defendants in certain matters—civil or criminal—implicating federal civil rights, even if a federal court would otherwise lack concurrent jurisdiction as normally required.²¹ But the latter provision, on which this Note focuses, has been practically available to defendants for only a handful of years since its enactment more than 150 years ago due to a series of Supreme Court decisions construing the statute very narrowly.²²

This Part traces most of that history. Section I.A examines the Reconstruction Congress's enactment of the civil rights removal statute in the 1860s, and section I.B analyzes the Supreme Court's restrictive interpretations of the provision in a series of late nineteenth-century cases.

A. *Reconstruction Removal*

Civil rights removal emerged amid a fundamental shift in Congress's view of the relationship between the states and the federal government.²³

20. See Act of July 13, 1866, ch. 184, § 67, 14 Stat. 98, 171–72 (revenue officers and their agents defending actions taken under color of office); Habeas Corpus Act of 1863, ch. 81, § 5, 12 Stat. 755, 756–57 (all federal officers—civil or military—defending actions taken under color of office during the Civil War); see also Schmidt, *supra* note 17, at 1429–31 & n.145 (discussing several removal provisions enacted during the nineteenth century); Wiecek, *supra* note 14, at 338–39 (explaining that the Reconstruction Congress expanded removal for federal officers both “as an auxiliary procedural device for protecting the enforcement of substantive policies unrelated to removal” and “with the explicit and primary objective of expanding federal judicial power”). The broader successor to these statutes is the federal officer removal statute, codified at 28 U.S.C. § 1442.

21. See Civil Rights Act of 1866, ch. 31, § 3, 14 Stat. 27, 27 (codified as amended at 28 U.S.C. § 1443) (civil rights removal statute); Schmidt, *supra* note 17, at 1429–30.

22. A brief timeline: Congress provided for civil rights removal in the Civil Rights Act of 1866, § 3, 14 Stat. at 27. See *infra* section I.A. The Supreme Court severely limited the statute less than fifteen years later in *Strauder v. West Virginia*, 100 U.S. 303 (1880), and *Virginia v. Rives*, 100 U.S. 313 (1880). See *infra* section I.B. The statute remained dormant until Congress invited judicial reinterpretation in the Civil Rights Act of 1964, Pub. L. No. 88-352, sec. 901, 78 Stat. 241, 266 (codified as amended at 28 U.S.C. § 1447(d)). See *infra* section II.A. Just two years later, the Court again severely limited the statute's usefulness in *Georgia v. Rachel*, 384 U.S. 780 (1966), and *City of Greenwood v. Peacock*, 384 U.S. 808 (1966). See *infra* section II.C.

23. See Richard White, *The Republic for Which It Stands: The United States During Reconstruction and the Gilded Age, 1865–1896*, at 74 (2017) (“The Republicans sought to abrogate judicial interpretations of the Constitution that, in the name of federalism, had limited the extension of a uniform set of rights applicable to all citizens everywhere in the Union.”); see also Amsterdam, *Federal Removal*, *supra* note 13, at 828–29 (suggesting that the Reconstruction Congress abandoned the “assumption . . . that the state courts were the normal place for enforcement of federal law save in rare and narrow instances where they affirmatively demonstrated themselves unfit or unfair”); *supra* notes 18–19 and accompanying text; *infra* note 27. Professor Anthony G. Amsterdam's article on the civil rights removal statute, 28 U.S.C. § 1443 (1958), and the federal habeas corpus statute, *id.* § 2241, is the most detailed and comprehensive work on the topics. For an overview of the

Before the Civil War, private litigants “generally had to look to the state courts in the first instance for vindication of federal claims, subject to limited review by the Supreme Court.”²⁴ Federal courts possessed narrow civil diversity and removal jurisdiction to combat extreme instances of local prejudice, but they were excluded from involvement in state criminal proceedings.²⁵ Limited exceptions during the early and mid-nineteenth century gave way to significant encroachments on state courts during and immediately after the war.²⁶ While there is ample debate over the intent behind these expansions of federal jurisdiction,²⁷ it is clear that Congress during this period took significant, unprecedented steps to secure the liberty and equality of Black Americans and that accompanying those steps were statutory commitments to uphold federal authority against state resistance.²⁸

origin of these statutes amid Congress’s reevaluation of federalism in matters of civil rights, see generally Amsterdam, *Federal Removal*, supra note 13, at 805–42. For a critique of Amsterdam’s framing of the cases interpreting these provisions, see Schmidt, supra note 17, at 1437–38 (describing Amsterdam’s work as “[e]rudite and brilliant” but “a work of advocacy”). Professor Benno C. Schmidt, Jr., offers his own analysis of the Reconstruction Congress’s views on these matters, arguing that Republican members’ rigid commitment to antebellum conceptions of federalism “doomed Reconstruction’s hopes for the future.” See *id.* at 1492–97.

24. Richard H. Fallon, Jr., John F. Manning, Daniel J. Meltzer & David L. Shapiro, *Hart and Wechsler’s The Federal Courts and the Federal System* 780–81 (7th ed. 2015); see also Amsterdam, *Federal Removal*, supra note 13, at 828.

25. Amsterdam, *Federal Removal*, supra note 13, at 805–06. The original grant of removal jurisdiction did not enable removal for criminal defendants. See *Judiciary Act of 1789*, ch. 20, § 12, 1 Stat. 73, 79–80.

26. See Amsterdam, *Federal Removal*, supra note 13, at 806–11 (detailing such jurisdictional expansions between 1815 and 1866). Among those limited exceptions was the first incarnation of federal officer removal jurisdiction, which originated for revenue officers in the *Force Bill*, ch. 57, § 3, 4 Stat. 632, 633–34 (1833), before expanding to its current form in 1948, see *Act of June 25, 1948*, ch. 646, § 1442, 62 Stat. 869, 938 (codified as amended at 28 U.S.C. § 1442 (2018)); Amsterdam, *Federal Removal*, supra note 13, at 806–07 & n.62. On the broader encroachments, see supra notes 18–21 and accompanying text.

27. Whether these statutes and the Fourteenth Amendment were intended to transform the federal system is a deeply contested issue more capably examined elsewhere. Compare Amsterdam, *Federal Removal*, supra note 13, at 828 (“Now the federal courts were seen as the needed organs, the ordinary and natural agencies, for the administration of federal rights.”), with Schmidt, supra note 17, at 1492–95 (“The fundamental institutional assumption of Reconstruction . . . was that the day-to-day protection of person and property remained the responsibility of the states. . . . [T]he federal trial courts would be contingent and secondary, available for the occasional instance of state judicial error or defiance of federal law.”). See also supra note 23. Schmidt nonetheless recognized “an equally fundamental, theoretical commitment of Reconstruction”—that “the freedmen should enjoy basic civil rights, federally guaranteed and federally protected if necessary”—and viewed the civil rights removal statute as “the central means for spanning the gap between institutional assumptions and theoretical commitments.” Schmidt, supra note 17, at 1492.

28. See Amsterdam, *Federal Removal*, supra note 13, at 828–29 (identifying the three Reconstruction amendments and four civil rights acts during this period); see also, e.g., *Monroe v. Pape*, 365 U.S. 167, 180 (1961) (characterizing the Civil Rights Act of 1871, ch. 22, 17 Stat. 13, as “passed . . . to afford a federal right in federal courts because . . . [the]

The first of these postwar measures was the Civil Rights Act of 1866, enacted by Congress over President Andrew Johnson's veto on April 9, 1866.²⁹ The first major civil rights legislation acknowledged in its first section the citizenship of all persons born in the United States regardless of race and affirmed that all possess the same rights "to make and enforce contracts, to sue, be parties, and give evidence, to inherit, purchase, lease, sell, hold, and convey real and personal property, and to full and equal benefit of all laws and proceedings for the security of person and property, as [are] enjoyed by white citizens."³⁰ Its third section conferred civil rights removal jurisdiction on the lower federal courts for the first time, enabling removal for "persons who are denied or cannot enforce in the courts or judicial tribunals of the State or locality where they may be any of the rights secured to them by the first section of this act."³¹

Many scholars have described the removal provision as one of obscurity, and its scarce legislative history has aggravated interpretative efforts.³² Debates from the statute's genesis—over, for example, what it means to be denied or unable to enforce one's rights and which rights in particular enable removal—have surely contributed to the law's enduring ineffectiveness.³³ Yet most agree that part of Congress's motivation for expanding federal jurisdiction during this time was its recognition that Supreme Court review of state judgments was inadequate to ensure federal constitutional and statutory protections amid their nonrecognition by state courts.³⁴ Given the volume of civil rights cases and the Supreme

rights, privileges, and immunities guaranteed by the Fourteenth Amendment might be denied by the state agencies"). Professor Robert J. Kaczorowski closely examines whether those statutory commitments (including civil rights removal) were effectively enforced by various government organs in the immediate aftermath of the war. See Kaczorowski, *supra* note 18.

29. See Civil Rights Act of 1866, ch. 31, 14 Stat. 27; S. Exec. Doc. No. 39-31 (Mar. 27, 1866) (President Johnson's message to Congress regarding his veto); see also Schmidt, *supra* note 17, at 1493 (explaining the veto as "partly because [Johnson] thought the removal provision would displace the state courts in all cases involving the freedmen").

30. Civil Rights Act of 1866 § 1, 14 Stat. at 27.

31. *Id.* § 3, 14 Stat. at 27. For a meticulous treatment of the legislative history behind this provision, see Amsterdam, *Federal Removal*, *supra* note 13, at 810-18 & nn.77-108.

32. See, e.g., Amsterdam, *Federal Removal*, *supra* note 13, at 843 ("exquisite obscurity"); Schmidt, *supra* note 17, at 1429 ("consummate obscurity"); see also Amsterdam, *Federal Removal*, *supra* note 13, at 814 (recognizing how little is revealed in the statute's legislative history).

33. See Schmidt, *supra* note 17, at 1431 (positing that nobody "in the Reconstruction Congress had considered the conceptual or factual predicates necessary for the conclusion that a criminal defendant could not enforce his or her 'equal civil rights' in the state courts"); *infra* sections I.B, II.C (describing the Supreme Court's grappling with these questions in the nineteenth and twentieth centuries, respectively).

34. See, e.g., Amsterdam, *Federal Removal*, *supra* note 13, at 808-09 & n.70 (describing congressional debates on federal officer removal to the same effect); Michael G. Collins, *The Right to Avoid Trial: Justifying Federal Court Intervention Into Ongoing State Court Proceedings*, 66 N.C. L. Rev. 49, 79 (1987) [hereinafter Collins, *Federal Court*

Court's limited capacity to review appeals, withholding jurisdiction from lower federal courts to conduct widespread enforcement of federal rights would have an effect "indistinguishable from that of a substantive statute foreclosing [those] claim[s]." ³⁵

The 1866 Act motivated many members of Congress to support adopting the Fourteenth Amendment during the same Congress. ³⁶ After the Amendment's ratification, the next Congress reenacted the entirety of the 1866 Act in the Civil Rights Act of 1871, ³⁷ and in 1875, the *Revised Statutes of the United States* carried forward all of the civil rights provisions Congress had produced during the preceding decade, including the civil rights removal provision. ³⁸ As codified, the removal provision's language was slightly broader than its original version, now referring generally to "any right secured . . . by any law providing for the equal civil rights of citizens" rather than only to the provisions in the first section of the 1866 Act. ³⁹ The provision has largely maintained its current form since that revision. ⁴⁰

Intervention]; Theodore Eisenberg, Congressional Authority to Restrict Lower Federal Court Jurisdiction, 83 Yale L.J. 498, 521–23 & n.127 (1974); Schmidt, *supra* note 17, at 1498–99 ("The Supreme Court can police the surface of state law. . . . But unless a vigorous lower federal judiciary is committed to the task of enforcement, nondiscrimination principles will stop at the surface if the state courts dedicate themselves to evasion.").

35. Eisenberg, *supra* note 34, at 523. This view that Supreme Court review is inadequate to protect federal civil rights has endured. See, e.g., Fallon et al., *supra* note 24, at 1281 (noting that one justification for the Court's decision in *Brown v. Allen*, 344 U.S. 443 (1953), "rests on the inability of the Supreme Court adequately to protect constitutional rights through its direct review of state court judgments"); Henry J. Friendly, *Federal Jurisdiction: A General View* 102–03 (1973) (discussing the "inadequacies" of leaving "private civil rights litigants . . . to the state courts with the attendant possibility of Supreme Court review" and concluding that it would be "a serious mistake to impose a general requirement of 'exhaustion' of state judicial remedies in civil rights cases").

36. See *Hurd v. Hodge*, 334 U.S. 24, 32–33 & nn.11–14 (1948) (noting that many members supported adopting the Fourteenth Amendment "to incorporate the guaranties of the Civil Rights Act of 1866 in the organic law of the land" or "to eliminate doubt as to the constitutional validity of the Civil Rights Act as applied to the States"); White, *supra* note 23, at 73. The Supreme Court held in *Strauder v. West Virginia* that the purpose of the Fourteenth Amendment was substantially similar to that of the 1866 Act: "to assure to [Black Americans] the enjoyment of all the civil rights that under the law are enjoyed by white persons, and to give to that race the protection of the general government, in that enjoyment, whenever it should be denied by the States." 100 U.S. 303, 306 (1880); see also *infra* notes 47–48 and accompanying text.

37. Civil Rights Act of 1871, ch. 114, § 18, 16 Stat. 140, 144.

38. See 13 Rev. Stat. § 641 (1875); Amsterdam, *Federal Removal*, *supra* note 13, at 827–28 & n.149.

39. See Schmidt, *supra* note 17, at 1430 n.147 (internal quotation marks omitted) (quoting 13 Rev. Stat. § 641) (comparing the 1866 and 1875 statutes).

40. See Amsterdam, *Federal Removal*, *supra* note 13, at 828 & n.150 (tracing the subsequent history of the statute to its current placement in title 28 of the *United States Code*). For the full text of the current version, see *supra* note 3.

B. *Restriction*

The Supreme Court first construed the civil rights removal statute in 1880.⁴¹ At that time, defendants were required to request removal from the state court, after which they could petition the federal trial court to effect removal by service of process.⁴² In *Strauder v. West Virginia* and *Virginia v. Rives*, decided on the same day in opinions authored by Justice William Strong, the Court distinguished two removals in murder trials based on the presence of racially discriminatory juries in the defendants' state forums.⁴³ The result in the latter decision was a very narrow reading of the statute—requiring a showing of a facially discriminatory state law—that essentially nullified its utility for many parties with federal civil rights defenses.

Taylor Strauder, indicted for murder in a West Virginia court, petitioned before trial for removal of his case to the appropriate federal trial court on the basis that state law prohibited Black men from serving on juries; thus, “he had reason to believe, and did believe, he could not have the full and equal benefit of all laws and proceedings in the State of West Virginia for the security of his person as is enjoyed by white citizens.”⁴⁴ The state court denied his petition and proceeded with the trial, and the state supreme court affirmed his conviction.⁴⁵

On successful writ of error, the U.S. Supreme Court considered whether every citizen has a right to trial by “a jury selected and impanelled without discrimination against his race or color, because of race or color” and, if so, whether removal is available when a defendant is denied such a right.⁴⁶ The Court ruled that West Virginia’s exclusion of Black Americans from juries improperly denied them equal protection of the laws in violation of the Fourteenth Amendment.⁴⁷ It then affirmed Congress’s power to enforce those protections through appropriate legislation,

41. See *Virginia v. Rives*, 100 U.S. 313 (1880); *Strauder*, 100 U.S. 303.

42. This is the process that led to Supreme Court review in *Rives*. See Amsterdam, *Federal Removal*, supra note 13, at 845 n.211. Alternatively, a defendant could seek direct Supreme Court review of the state court’s ruling, but only after exhausting the state trial and appeals process. See *id.* This is the process that led to Supreme Court review in *Strauder*. See Collins, *Federal Court Intervention*, supra note 34, at 78 n.147.

43. For a detailed treatment of the Court’s decisions in *Strauder* and *Rives* within the evolution of jury discrimination jurisprudence, see Schmidt, supra note 17, at 1414–55.

44. *Strauder*, 100 U.S. at 304 (internal quotation marks omitted) (quoting Strauder’s petition for removal).

45. *Id.*

46. *Id.* at 305.

47. See *id.* at 305–10.

describing removal as “one very efficient and appropriate mode of extending such protection and securing to a party the enjoyment of the right or immunity.”⁴⁸

Strauder was the first case in which the Supreme Court held that Black people could not be excluded from juries because of their race.⁴⁹ It also clearly endorsed civil rights removal as a procedural tool for the enforcement of federal rights, but it managed to do so without answering the difficult questions of statutory interpretation implicated by the provision.⁵⁰ The Court could not avoid those questions in *Rives*, and it answered them “in an offhand, careless way.”⁵¹

Rives involved two Black men indicted for murder in a Virginia court who petitioned for removal to the appropriate federal trial court on the basis that though Virginia’s jury selection law was facially neutral, no Black person had ever been allowed to serve on a jury in their county in any case involving Black people; thus, “they were satisfied they could not obtain an impartial trial before a jury exclusively composed of the white race.”⁵² As in *Strauder*, the state court denied their petitions and proceeded with the trial, which resulted in two convictions.⁵³

While the *Rives* Court affirmed that “there can be no reasonable doubt” that Congress may provide for civil rights removal through its Fourteenth Amendment enforcement power, it held that the specific removal provision enacted in the *Revised Statutes* “clearly” does not apply to “all cases in which equal protection of the laws may be denied to a defendant.”⁵⁴ The Court reasoned, as a matter of statutory interpretation, that no defendant could remove based on an alleged denial of federal rights taking place during judicial proceedings, such as through discrimination in jury selection.⁵⁵ Instead, the Court said that the civil

48. *Id.* at 311. The provisions of the Civil Rights Act of 1866 as reenacted in the *Revised Statutes*, the Court said, “put[] in the form of a statute what had been substantially ordained by the constitutional amendment.” *Id.* at 312. Civil rights removal, in particular, “was an advanced step, fully warranted . . . by the fifth section of the Fourteenth Amendment.” *Id.*; see also U.S. Const. amend. XIV, § 5 (empowering Congress to enforce the Amendment).

49. See Michael J. Klarman, *The Racial Origins of Modern Criminal Procedure*, 99 *Mich. L. Rev.* 48, 61 (2000). Later decisions “made such discrimination virtually impossible to prove.” *Id.*; see also Schmidt, *supra* note 17, at 1462–72 (describing how “the theme of deference to state court factfinding” pervaded Supreme Court adjudication of jury discrimination claims until the 1930s).

50. See Schmidt, *supra* note 17, at 1432–33; *supra* note 33 and accompanying text.

51. Schmidt, *supra* note 17, at 1433.

52. *Virginia v. Rives*, 100 U.S. 313, 315 (1880).

53. *Id.* at 316; see also *Strauder*, 100 U.S. at 304.

54. See *Rives*, 100 U.S. at 318–19; *supra* text accompanying note 39 (providing the text of the provision as codified in the *Revised Statutes*).

55. See *Rives*, 100 U.S. at 319–20 (“When [the defendant] has only an apprehension that such rights will be withheld from him when his case shall come to trial, he cannot affirm that they are actually denied, or that he cannot enforce them. Yet such an affirmation is

rights removal statute applied only amid “a denial of such rights, or an inability to enforce them, resulting from *the Constitution or laws of the State*, rather than a denial first made manifest at the trial of the case.”⁵⁶ Thus, since Virginia law did not expressly deny the defendants’ federal right to jury selection free from discrimination, the defendants did not state a valid basis for removal under the civil rights removal statute.⁵⁷

In limiting civil rights removal jurisdiction to cases arising from state constitutional and statutory law that facially denied federal rights, the Supreme Court retained for itself alone the power of federal review over state judicial and administrative decisions denying such rights.⁵⁸ The effect for Black defendants in subsequent decades was generally indistinguishable from the substantive denial of those rights, the exact predicament the Reconstruction Congress sought to prevent by conferring removal jurisdiction on the lower federal courts in 1866.⁵⁹ The Court reaffirmed this interpretation of the removal statute several times through the turn of the century,⁶⁰ and Congress’s elimination of federal appellate review of lower court remand orders in 1887 stripped the Court of most opportunities to reconsider its prior decisions—cementing the restrictive *Strauder–Rives* interpretation for nearly a century.⁶¹

essential to his right to remove his case.”). For an argument that this interpretation is incorrect, see Schmidt, *supra* note 17, at 1432–36.

56. *Rives*, 100 U.S. at 319 (emphasis added).

57. See *id.* at 320–22. This despite nothing in the text of the original or revised removal provision limiting removal to cases involving express statutory denials of federal rights. See 13 Rev. Stat. § 641 (1875) (revised text); Civil Rights Act of 1866, ch. 31, § 3, 14 Stat. 27, 27 (original text); see also Schmidt, *supra* note 17, at 1435 (analyzing the text in light of *Rives*).

58. In other words, while defendants claiming a state constitutional or statutory denial of federal rights could seek federal review through civil rights removal, federal appellate review of other forms of state denials of federal rights (e.g., discriminatory enforcement by the executive branch or adjudication by the judicial branch) was possible only by petitioning the Supreme Court after exhausting the state trial and appeals process. See Schmidt, *supra* note 17, at 1434; *supra* note 42.

59. See *supra* notes 34–35 and accompanying text. Schmidt argues that the Court’s construction of the removal statute in *Rives* “may well have had a disastrous effect on race relations for more than a half-century by closing federal trial courts to proof of jury discrimination.” Schmidt, *supra* note 17, at 1434.

60. See *Kentucky v. Powers*, 201 U.S. 1, 30–31 (1906); *Williams v. Mississippi*, 170 U.S. 213, 225 (1898); *Murray v. Louisiana*, 163 U.S. 101, 105–06 (1896); *Smith v. Mississippi*, 162 U.S. 592, 600 (1896); *Gibson v. Mississippi*, 162 U.S. 565, 582–83 (1896); *Bush v. Kentucky*, 107 U.S. 110, 115–16 (1883); *Neal v. Delaware*, 103 U.S. 370, 392–93 (1881). These cases are summarized in Amsterdam, *Federal Removal*, *supra* note 13, at 845–50 & n.215.

61. See Act of Mar. 3, 1887, ch. 373, § 2, 24 Stat. 552, 553. While Supreme Court review technically remained available through appeals of final state judgments, see *supra* note 42, construction of the removal statute was rarely relevant to the Court’s disposition of a case, see Amsterdam, *Federal Removal*, *supra* note 13, at 847 n.215, 848 n.217 (describing this issue and explaining that preserving a removal claim “added nothing to other federal claims so preserved”). Indeed, the Court did not address civil rights removal in any cases between its decisions in *Powers*, 201 U.S. 1, and *Georgia v. Rachel*, 384 U.S. 780 (1966).

II. THE CIVIL RIGHTS MOVEMENT: A STRATEGIC INNOVATION SWIFTLY REVERTED

The Civil Rights Movement of the 1950s and 1960s returned Congress's attention to civil rights legislation for the first time since Reconstruction.⁶² Accompanying these new federal civil rights guarantees were innovative procedural tools embraced by civil rights lawyers and federal courts to realize these rights over the resistance of southern state and local governments.⁶³ Among them was civil rights removal, resurrected by Congress in 1964 and immediately used to shift thousands of prejudicial state prosecutions into a federal forum.⁶⁴ But the Supreme Court responded nearly as quickly, dealing a new set of interpretive blows that condemned civil rights removal to another era of "exquisite obscurity."⁶⁵

This Part reveals the story of civil rights removal in the Civil Rights Movement. Section II.A describes Congress's successful effort to revitalize the statute in the Civil Rights Act of 1964. Section II.B conducts a case study of civil rights removal in Mississippi, focusing primarily on the years 1964 through 1966. Incorporating data from thousands of cases removed to federal district courts during that time, this study is the first close examination of the provision's real-world utility during that innovative period. Section II.C then analyzes how the Supreme Court brought that moment to an abrupt end in a pair of cases that adopted an even narrower construction of the removal statute.

A. *Resurrection*

By the 1960s, civil rights removal had spent a century on the books, but there was little to show for it. Lower federal courts had faithfully applied the narrow *Strauder–Rives* doctrine for decades,⁶⁶ appellate courts were statutorily barred from reviewing remand orders,⁶⁷ and the Supreme Court accordingly encountered no occasion to revisit the statute. In 1964, however, Congress's revived engagement with civil rights legislation

62. See Civil Rights Act of 1968, Pub. L. No. 90-284, 82 Stat. 73; Voting Rights Act of 1965, Pub. L. No. 89-110, 79 Stat. 437; Civil Rights Act of 1964, Pub. L. No. 88-352, 78 Stat. 241; Civil Rights Act of 1960, Pub. L. No. 86-449, 74 Stat. 86; Civil Rights Act of 1957, Pub. L. No. 85-315, 71 Stat. 634. The 1957 Act was the first civil rights legislation passed by Congress since the Civil Rights Act of 1875, ch. 114, 18 Stat. 335.

63. On the efforts of civil rights lawyers and Fifth Circuit judges to effect racial integration in the South during the 1950s and 1960s, see generally Jack Bass, *Unlikely Heroes* (1981).

64. See *infra* sections II.A–B.

65. See Amsterdam, *Federal Removal*, *supra* note 13, at 843; *supra* note 32 and accompanying text; *infra* section II.C.

66. See, e.g., Amsterdam, *Federal Removal*, *supra* note 13, at 850 n.222 (collecting more than twenty lower-court cases applying *Rives*).

67. See *supra* note 61 and accompanying text.

presented an opportunity to revitalize removal at the height of the Civil Rights Movement.

In June 1963, President John F. Kennedy recommended to Congress a legislative package that would eventually become the Civil Rights Act of 1964.⁶⁸ The House Judiciary Committee's Civil Rights Subcommittee immediately began hearings on the proposed legislation and reported to the full committee a "considerably more comprehensive" bill in October 1963.⁶⁹ Included in that proposal was a new provision that reenabled appellate review of federal trial courts' decisions to remand civil rights cases to state courts.⁷⁰ Its backers hoped that this mechanism would lead federal appellate courts to reinterpret the scope of the civil rights removal statute, the actual text of which would not be affected by this legislation.⁷¹ In testimony, Attorney General Robert F. Kennedy expressed strong support for the appeal provision, noting that "the non-appealability of an order of remand has made the [civil rights removal] provision almost useless."⁷² The Judiciary Committee reported the bill in November, retaining the appeal provision under Title IX.⁷³ The provision was not changed during debate and voting on amendments before the full House and Senate, which passed the bill in February and June 1964, respectively.⁷⁴ On July 2, the House adopted the Senate's revised bill, and President Lyndon B. Johnson signed the Civil Rights Act into law.⁷⁵

The legislative history reveals substantial support for the appeal provision in both chambers despite vocal resistance by some southern members.⁷⁶ Those opposed to the provision criticized, among other

68. Paul M. Downing, Cong. Rsch. Serv., E185B, *The Civil Rights Act of 1964: Legislative History; Pro and Con Arguments; Text 4-8* (1965), https://www.senate.gov/artandhistory/history/resources/pdf/CivilRights_CRSReport1965.pdf [<https://perma.cc/YNP4-P8ZA>] (providing brief synopses of each title of the proposed bill).

69. *Id.* at 11.

70. *Id.* at 12; see also *supra* note 61 and accompanying text (discussing the 1887 bar on such appeals).

71. See *infra* notes 79-80 and accompanying text.

72. See Robert F. Kennedy, U.S. Att'y Gen., Statement on H.R. 7152, at 24 (Oct. 15, 1963), <https://www.justice.gov/sites/default/files/ag/legacy/2011/01/20/10-15-1963.pdf> [<https://perma.cc/L6UF-4YDK>].

73. Downing, *supra* note 68, at 13, 16.

74. See *id.* at 16-20 (House proceedings); *id.* at 23, 31-32 (Senate proceedings).

75. See *id.* at 32; see also Civil Rights Act of 1964, Pub. L. No. 88-352, 78 Stat. 241.

76. See 110 Cong. Rec. 2769-84 (Feb. 10, 1964) (House debate and votes on amendments to the appeal provision). The relevant Senate debate is more scattered. See *id.* at 14459 (June 19, 1964) (statement of Sen. Morton); *id.* at 13879-80 (June 16, 1964) (statement of Sen. Byrd and vote on amendment striking appeal provision); *id.* at 13468 (June 11, 1964) (statement of Sen. Ervin and vote on amendment striking appeal provision); *id.* at 13172-73 (June 9, 1964) (statement of Sen. Byrd); *id.* at 11320-21 (May 19, 1964) (statement of Sen. Sparkman); *id.* at 7784-85 (Apr. 13, 1964) (statement of Sen. Smathers); *id.* at 6955-56 (Apr. 6, 1964) (statement of Sen. Dodd); *id.* at 6551 (Mar. 30, 1964) (statement of Sen. Humphrey); *id.* at 6451 (Mar. 26, 1964) (statement of Sen. Dirksen).

aspects, its “radical departure from traditional legal procedures,”⁷⁷ its “handicap” on state and local courts, and the manner in which it would “add immeasurably to existing delay in the enforcement of legal rights.”⁷⁸ Several members who supported the bill called for federal appellate courts to reinterpret the civil rights removal statute when reviewing remand orders.⁷⁹ Reinterpretation was warranted, they argued, to combat modern discriminatory practices not captured by the *Strauder–Rives* doctrine’s facial-discrimination requirement.⁸⁰

The passage of the Civil Rights Act of 1964, despite not actually altering the text of the civil rights removal provision, “restored life to a provision of the Civil Rights Act of 1866 which had been virtually invalidated.”⁸¹ Almost immediately, appellate courts began to answer Congress’s invitation to reinterpret the removal statute, often expanding its reach.⁸² The 1964 Act’s “specific congressional sanction to an expanded role for the courts of appeals in civil rights matters” stymied the efforts of prejudiced southern district court judges to keep civil rights cases in hostile state courts and “provided a major weapon for scores of civil rights

77. 110 Cong. Rec. 6451 (Mar. 26, 1964) (statement of Sen. Dirksen). This despite appeals being available before 1887. See *supra* note 61 and accompanying text.

78. 110 Cong. Rec. 6451 (Mar. 26, 1964) (statement of Sen. Dirksen); see also, e.g., *id.* at 13172–73 (June 9, 1964) (statement of Sen. Byrd) (similar criticisms); *id.* at 2771–72 (Feb. 10, 1964) (statement of Rep. Dowdy) (same). The Congressional Research Service summarized arguments against Title IX: The provision “could cause indefinite delay in exercise of jurisdiction by the State court. Local police and courts could not control lawless agitators and protect the rights of others. [It] would also place civil rights litigants at an unfair advantage over other litigants.” Downing, *supra* note 68, at 41.

79. See, e.g., 110 Cong. Rec. 6955 (Apr. 6, 1964) (statement of Sen. Dodd) (“[T]he right to a fair trial free from racial hostility and antagonism should be guaranteed. . . . It is the purpose of title IX to make it possible for the courts to consider whether the removal statute can be given such construction.”); *id.* at 2770 (Feb. 10, 1964) (statement of Rep. Kastenmeier) (“[W]e are . . . asking that the law, frozen as it has been for almost 60 years . . . , be reviewed . . . [and] that the court of appeals be authorized to reinterpret these laws.”).

80. Representative Robert Kastenmeier, for example, argued:

It would seem that under reinterpretation of section 1443 cases involving State criminal prosecution brought to intimidate the petitioner, cases involving such community hostility that a fair trial in the State or local courts is unlikely or impossible, and other such cases . . . might now well be construed to be within the scope of said section. If so, once again we will breathe life into the Civil Rights Acts of 1866 and give meaning to the purpose intended.

110 Cong. Rec. 2770 (Feb. 10, 1964) (statement of Rep. Kastenmeier). The Congressional Research Service identified this as a primary argument in favor of Title IX: Civil rights removal is available “only if State constitutions or laws are alleged to be in violation of the U.S. Constitution. But the present problem is discriminatory application of State constitutions and laws. Federal judges tend now to return these cases to State courts. This title will [enable appellate review of] such remands.” Downing, *supra* note 68, at 40.

81. See Bass, *supra* note 63, at 253.

82. See U.S. Comm’n on C.R., *Law Enforcement: A Report on Equal Protection in the South* 132–34 (1965) (summarizing circuit court decisions); *infra* section II.B.1.

lawyers who came temporarily to the South to fight the court battles that followed.”⁸³ The extent of this removal revolution is revealed in the story of civil rights removal—and the lawyers who seized its moment—during the height of the Civil Rights Movement in Mississippi.

B. *Case Study: Civil Rights Removal in Mississippi, 1964–1966*

In 1964, mass arrests of civil rights demonstrators, refusal of local counsel to represent them, and harsh judgment by state courts imbued with prejudice defined the Mississippi justice system.⁸⁴ For defendants, the only hope for real justice was intervention by a perhaps-friendlier federal court.⁸⁵ Removal provided that chance, and hundreds embraced the choice to proceed in a federal forum. This section highlights the prevalence of that choice amid the Civil Rights Movement in Mississippi during the mid-1960s. In particular, it explores how lawyers embraced the civil rights removal statute as an innovative procedural tool to place their clients in a favorable forum, overcoming procedural hurdles and unleashing a wave of removals in 1964 that would persist until the Supreme Court once again brought removal’s utility to a halt two years later.⁸⁶

This removal phenomenon was not unique to Mississippi. Civil rights lawyers strategically employed removal throughout the South during this period, and there is evidence that it was used in other parts of the nation as well.⁸⁷ Indeed, even then-Judge Thurgood Marshall of the U.S. Court of Appeals for the Second Circuit, acting quickly on the Civil Rights Act’s renewal of remand-order appealability in 1964, ordered that a federal district court retain jurisdiction over a case involving around fifty defendants arrested during sit-ins at the New York World’s Fair.⁸⁸ Mississippi is nonetheless an appropriate subject of this study not only because it was arguably

83. Bass, *supra* note 63, at 253; see also *infra* section II.B.2.

84. See *supra* note 1 and accompanying text.

85. As this case study illustrates, the perhaps-friendlier court was not necessarily the federal district court; many defendants’ goal often was to get their case before the civil-rights-favoring U.S. Court of Appeals for the Fifth Circuit. See *infra* notes 100, 103, and accompanying text; see also Jack Greenberg, *Crusaders in the Courts* 379 (Twelve Tables Press anniv. ed. 2004) (1994) (“[R]emoval wasn’t always desirable. . . . Indeed, apart from [Fifth Circuit judges] Tuttle, Wisdom, Brown, [Alabama district court judge] Johnson, and just a few others, Southern federal judges were indistinguishable from state judges in racial attitude.”).

86. See *infra* section II.C.

87. See Alfred E. Clark, *U.S. Judge to Hear Rights Case Here; 50 Fair Pickets Are Seeking Trial in Federal Court*, *N.Y. Times*, Aug. 27, 1964, at 37 (noting removals in New York and that “about 500 similar cases of civil rights protest arrests were pending now in Mississippi, as well as hundreds of others in Alabama, Georgia, Florida, Virginia and North Carolina”).

88. See *id.* The novelty of the removal statute and confusion over its scope during this period also led to situations in which criminal defendants with no apparent civil rights defenses, such as gamblers charged with a criminal conspiracy in New York, invoked removal to move their cases to federal court. See David Anderson, *Gamblers Invoke Civil Rights Law*;

the epicenter of the Civil Rights Movement during this brief period, the beginning of which coincided with the Freedom Summer project,⁸⁹ but also because the wide scope and persistent stalling of removals in the state reflect how civil rights removal's forum-setting potential could not be fully realized without further statutory reform.

The cases and data discussed in this section are the product of an analysis of almost 5,000 criminal cases filed in U.S. District Courts for the Northern and Southern Districts of Mississippi from 1961 through 1969.⁹⁰ Of those, more than 1,200 were cases removed from Mississippi state courts, almost all of which were filed between June 1964 and June 1966.⁹¹ Most of the case files that informed this study are available only in their original versions at the National Archives; thousands of these records were digitized for the first time for this Note.⁹² As a contribution to the historical record, Appendix A to this Note includes docket information for every criminal case removed from Mississippi state courts during the 1960s.⁹³

1. *The Landscape.* — Throughout the early 1960s, thousands of Black Mississippians persisted in their attempts to register to vote despite unrelenting violence and interference by Mississippi law enforcement acting under the guise of facially neutral state laws.⁹⁴ The full force of the state justice system stood against these citizens: Peaceful attempts to register often resulted in arrest, jail time, and bail “set in amounts calculated to bankrupt . . . civil rights organizations.”⁹⁵ White lawyers

Prosecutors Decry Shifting of Cases to U.S. Courts, *N.Y. Times*, Oct. 16, 1964, at 29 (“The practice of shifting cases . . . is now commonly followed in Southern states, where civil rights defenders prefer Federal courts to local courts, but legal experts say the law was never intended to be an evasive tactic in the sense in which it is being used here.”).

89. See *supra* note 1.

90. Almost every criminal case filed in Mississippi federal courts during this period is included in this dataset (totaling 4,767 cases), which this Note treats as exhaustive. Missing are cases filed in the Southern District, Meridian Division, before January 3, 1964, and in the Southern District, Hattiesburg Division, after March 25, 1968.

91. See *infra* Appendix A. Additional data are on file with the *Columbia Law Review*.

92. The case files and related correspondence for *Lefton v. City of Hattiesburg*, discussed in section II.B.1, are digitized and available online through the Wisconsin Historical Society's Freedom Summer Digital Collection. All other dockets, case files, and related information are located at the National Archives at Atlanta and are not currently available online. Digitization of relevant resources for this Note, totaling several thousand pages, took place in Atlanta, Georgia, in 2022 in coordination with an archivist.

93. See *supra* note 90 for two small gaps in this dataset. The National Archives could not provide original dockets for those periods.

94. See, e.g., U.S. Comm'n on C.R., *supra* note 82, at 15–42 (describing several outbreaks of racial violence across Mississippi and the ineffectiveness of state and local law enforcement responses); Amsterdam, *Federal Removal*, *supra* note 13, at 794–99 (presenting a hypothetical fact pattern representing the typical experience of Black Mississippians attempting to exercise their civil rights).

95. Amsterdam, *Federal Removal*, *supra* note 13, at 798–99. The 1965 report of the United States Commission on Civil Rights provides numerous examples of these

generally would not take civil rights cases, and only a handful of Black lawyers were admitted to the Mississippi Bar.⁹⁶ For those defendants able to secure representation, years would pass before their cases proceeded through the state court system and perhaps succeeded in securing Supreme Court review.⁹⁷

With local attorneys overwhelmed by cases and sure to face defeat in the state court system, out-of-state civil rights lawyers descended on Mississippi with cutting-edge procedural strategies designed to place scores of Black defendants in a forum more likely to recognize their constitutional defenses: federal court.⁹⁸ There was no easy way to do this, but of the three conceivable options (a federal injunction against the prosecution, civil rights removal, and pretrial habeas corpus), removal appeared the most promising.⁹⁹ Several problems nevertheless complicated the use of removal as a procedural civil rights tool, including the rights-friendly Fifth Circuit's inability to review remand orders and local district court rules that hindered the practical availability of removal in Mississippi.

The former issue, especially important given the racism of federal district court judges in Mississippi,¹⁰⁰ would be resolved by the passage of

circumstances. See U.S. Comm'n on C.R., *supra* note 82, at 60–62 (state legislation); *id.* at 62–68 (mass arrests); *id.* at 68–75 (bail); *id.* at 77–80 (sentencing).

96. See Bass, *supra* note 63, at 289 (describing “the refusal of the organized bar in the deep South to represent those involved in civil rights cases”); Greenberg, *supra* note 85, at 375 (noting that many white lawyers would not cooperate on civil rights matters and that “[t]here were only three [B]lack lawyers practicing in Mississippi at that time, Jack Young, Carsie Hall, and R. Jess Brown”); Amsterdam, *Federal Removal*, *supra* note 13, at 797 nn.12–13.

97. See Amsterdam, *Federal Removal*, *supra* note 13, at 797–99 (“[U]nresolved criminal charges hang over defendants for years, affecting their mobility, their acceptance at educational or other institutions, their eligibility for state benefits such as unemployment compensation, and, most important, their willingness to risk repeated exercise of federally guaranteed rights.” (footnotes omitted)).

98. See Bass, *supra* note 63, at 286 (explaining that the gap left by “the general abdication of the legal profession in the South . . . was filled by lawyers who came in from outside the South to join the handful of [B]lack attorneys in the region and the rare southern white lawyer willing to risk involvement”); Melvyn Zarr, *Recollections of My Time in the Civil Rights Movement*, 61 *Me. L. Rev.* 365, 370–72 (2009) (“[W]e quickly agreed that we did not want to submit our clients’ fates to the home cooking of the state courts. We had to contrive a way to get these criminal cases into federal court.”). LDF attorney-turned-law professor Melvyn Zarr explains how not even the leading casebook on the federal courts at the time, presumably Henry Hart and Herbert Wechsler’s *The Federal Courts and the Federal System*, included much detail on routes to federal court for these litigants. *Id.* at 371.

99. See Fallon et al., *supra* note 24, at 860 (listing these mechanisms and explaining that removal is ordinarily preferable for a civil rights litigant); Zarr, *supra* note 98, at 370–71 (describing these three mechanisms and his successful reliance on removal).

100. See Zarr, *supra* note 98, at 370–71 & nn.14, 17 (describing district court judge William Harold Cox as “a real out-and-out racist” who “would not and did not” grant relief and explaining that the lawyers’ goal was therefore to get their litigants before the friendlier Fifth Circuit in New Orleans); see also *infra* note 103.

the Civil Rights Act of 1964.¹⁰¹ In fact, the Fifth Circuit had already begun taking appeals by the time of the Act's passage, interpreting the 1887 bar on appeals not to include cases removed under the civil rights removal statute.¹⁰²

The latter issue involved local rules enacted by federal judges in the Southern District of Mississippi,¹⁰³ disputes over which culminated in the Fifth Circuit's June 1964 decision in *Lefton v. City of Hattiesburg*.¹⁰⁴ That case involved more than forty members of the Student Nonviolent Coordinating Committee (SNCC), all arrested while engaged in a voter registration drive in Hattiesburg, Mississippi, on April 10, 1964, for violating a state law passed two days earlier that prohibited demonstrations obstructing access to public buildings.¹⁰⁵ The defendants' Louisiana- and New York-based lawyers attempted to file a petition to remove the cases from state court to the U.S. District Court for the Southern District of Mississippi, alleging that the state statute was "vague, indefinite and unconstitutional on its face."¹⁰⁶ But the district court rejected the petition because it did not comply with local rules enacted by Judge Harold Cox in December 1963 requiring for every defendant (1) an individual removal petition and filing fee, (2) a \$500 removal bond, and (3) the signature of a local attorney.¹⁰⁷

101. See *supra* section II.A.

102. See U.S. Comm'n on C.R., *supra* note 82, at 134 n.69; Amsterdam, Federal Removal, *supra* note 13, at 832 n.173; *supra* note 61.

103. The Southern District consisted of only two judgeships in the 1960s. One seat was held by Sidney C. Mize from February 1937 until his death in April 1965. Mize, Sidney Carr, Fed. Jud. Ctr., <http://www.fjc.gov/history/judges/mize-sidney-carr> [<https://perma.cc/H8TF-TNXZ>] (last visited Sept. 19, 2023). The other seat was held by William H. Cox from June 1961 until he assumed senior status in October 1982. Cox, William Harold, Fed. Jud. Ctr., <https://www.fjc.gov/history/judges/cox-william-harold> [<https://perma.cc/N9W2-QSPA>] (last visited Sept. 19, 2023). Judge Mize "fit the mold of southern federal judges who were bent on resistance" to federal enforcement of civil rights, Fred L. Banks, Jr., *The United States Court of Appeals for the Fifth Circuit: A Personal Perspective*, 16 *Miss. Coll. L. Rev.* 275, 278 n.15 (1996), and Judge Cox has been described as "possibly the most racist judge ever to sit on the federal bench," see Greenberg, *supra* note 85, at 345, 375.

104. 333 F.2d 280 (5th Cir. 1964).

105. See *id.* at 282; see also *id.* at 282 n.1 (text of the statute).

106. See Petition for Removal para. 3, *City of Hattiesburg v. Lefton* (S.D. Miss. n.d.), <https://content.wisconsinhistory.org/digital/collection/p15932coll2/id/5896> (on file with the *Columbia Law Review*). The case has no docket number or filing date because the district court never docketed it.

107. See *Lefton*, 333 F.2d at 282–83. The Northern District had no such rules governing removal procedures. See Memorandum by Benjamin E. Smith at 3, *Lefton*, 333 F.2d 280 (No. 21441), <https://content.wisconsinhistory.org/digital/collection/p15932coll2/id/5965> (on file with the *Columbia Law Review*); see also Greenberg, *supra* note 85, at 375 ("[F]ederal judges Cox and Mize required out-of-state lawyers to appear with local counsel, although [Northern District] Judge Claude Clayton let in those who were admitted in other federal courts."). Still, that district did not see waves of removals until around the passage of the 1964 Civil Rights Act. See *infra* Appendix A. Without the Fifth Circuit's actions in *Lefton*, it

The defendants' lawyers, arguing that Judge Cox enacted the rules to "assist the steel hard policy of racial segregation in the State of Mississippi and to prevent access to the Federal Courts by individuals who have been wrongfully arrested and charged under statutes which violate the Federal Constitution and its amendments,"¹⁰⁸ sought a writ of mandamus from the Fifth Circuit to compel the district court to file the cases.¹⁰⁹ The circuit court issued a per curiam opinion three days later in which it agreed that the local rules requiring individual filings and bonds appeared to conflict with the federal statutory removal procedures in 28 U.S.C. § 1446; it also advised that no district court may "close its doors" to these litigants if local counsel were unavailable.¹¹⁰ This guidance angered the district court¹¹¹ and sparked hope for civil rights lawyers eager to use removal as a litigation tool across the South.¹¹²

is doubtful that the Southern District would have experienced similar removal waves. See *infra* section II.B.2.

108. See Memorandum by Bruce C. Waltzer, *Lefton*, 333 F.2d 280 (No. 21441), <https://content.wisconsinhistory.org/digital/collection/p15932coll2/id/5929> (on file with the *Columbia Law Review*).

109. See Alternative Petition for a Writ of Mandamus, *Lefton*, 333 F.2d 280 (No. 21441), <https://content.wisconsinhistory.org/digital/collection/p15932coll2/id/5912> (on file with the *Columbia Law Review*); see also Affidavit of William M. Kunstler, *Lefton*, 333 F.2d 280 (No. 21441), <https://content.wisconsinhistory.org/digital/collection/p15932coll2/id/5887> (on file with the *Columbia Law Review*). The petition and accompanying affidavit argued that the district court's local rules conflicted with title 28 of the *United States Code* and the Federal Rules of Civil Procedure.

110. See Per Curiam Opinion on Petition for Writ of Mandamus, *Lefton*, 333 F.2d 280 (No. 21441), <https://content.wisconsinhistory.org/digital/collection/p15932coll2/id/5930> (on file with the *Columbia Law Review*). The full text of the Fifth Circuit's opinion is copied at *Lefton*, 333 F.2d at 283 n.3. The court did not formally rule on the petition but simply informed the parties of its position on the matter and laid out what additional briefing would be necessary for it to grant the petition. Still, the opinion received national coverage. See U.S. Court's Rules Upset on Appeal; Basis Voided in Barring of Mississippi Rights Case, *N.Y. Times*, Apr. 19, 1964, at 65.

111. The tone of Judge Cox's correspondence with the Fifth Circuit devolved over time. Compare Letter from William Harold Cox, J., S.D. Miss., to Richard T. Rives, Griffin B. Bell & J. Skelly Wright, JJ., 5th Cir., at 4 (Apr. 18, 1964), <https://content.wisconsinhistory.org/digital/collection/p15932coll2/id/7116> (on file with the *Columbia Law Review*) ("Please excuse the desultory nature of this letter, and its inordinate length, but it involves a matter very important to this district . . ."), with Letter from William Harold Cox, J., S.D. Miss., to Richard T. Rives, Griffin B. Bell & J. Skelly Wright, JJ., 5th Cir., at 3 (May 2, 1964), <https://content.wisconsinhistory.org/digital/collection/p15932coll2/id/7121> (on file with the *Columbia Law Review*) ("[T]his court has given an advisory opinion in a phantom case where it has no jurisdiction of any of the parties.").

112. See Memorandum from Kunstler Kunstler & Kinoy and Smith, Waltzer, Jones & Peebles (Apr. 17, 1964), <https://content.wisconsinhistory.org/digital/collection/p15932coll2/id/7115> (on file with the *Columbia Law Review*) (circulating the per curiam opinion and underlying removal petition due to its importance to "civil rights litigation in Mississippi and other states of the South" and explaining how the opinion "disposes of serious procedural obstacles to federal civil rights litigation").

After further briefing, the Fifth Circuit affirmed its views on the bond and local-attorney requirements in a formal decision issued on June 5, 1964.¹¹³ It upheld the district court's individual-petition requirement, setting attorneys on a race to locate each defendant-petitioner—including several ministers who had since left the area—and secure their signature on a boilerplate removal petition.¹¹⁴ The successful petitions resulted in the removal of thirty-seven cases to the Southern District's Hattiesburg Division between June 26 and July 10, 1964, the start of a tidal wave of civil rights removals across Mississippi in the months to come.¹¹⁵

2. *The Moment.* — With local procedural hurdles extinguished and the Civil Rights Act's promise of broader appellate interpretation just around the corner, prominent civil rights lawyers immediately embraced civil rights removal as a strategic litigation tool. The very first batch of post-*Lefton* removals—seventy-four cases—was filed in Jackson only six days after the Fifth Circuit's decision. The lawyers? Jack Greenberg, Constance Baker Motley, and Derrick Bell.¹¹⁶

113. See *Lefton*, 333 F.2d 280. The court found the individual-petition requirement to be within the district court's discretion, "assuming that such a requirement d[id] not so delay matters as to operate to deprive the petitioners of effective access to the federal courts." See *id.* at 284–85. On the local-attorney requirement, the court said that "where local counsel are associated in the case to comply with court rules, non-local counsel chosen by the parties may nevertheless take the lead" and "waiver of local rules, or admission to the bar *pro hac vice*, should be allowed when, as herein alleged, the non-local counsel 'was unable to find counsel admitted [locally] who would sign the pleadings with him.'" *Id.* at 285–86 (alteration in original) (quoting Affidavit of Benjamin E. Smith, *Lefton*, 333 F.2d 280 (No. 21441), <https://content.wisconsinhistory.org/digital/collection/p15932coll2/id/5918> (on file with the *Columbia Law Review*)).

114. See Letter from William Harold Cox, J., S.D. Miss., to Dixon L. Pyles (June 8, 1964), <https://content.wisconsinhistory.org/digital/collection/p15932coll2/id/7131> (on file with the *Columbia Law Review*) (setting a seven-day deadline for securing each defendant-petitioner's signature); Letter from Benjamin E. Smith to Dixon Pyles (June 12, 1964), <https://content.wisconsinhistory.org/digital/collection/p15932coll2/id/7132> (on file with the *Columbia Law Review*) (describing the drafting of the petition and struggle to locate out-of-state petitioners); Letter from Sheila Michaels to Dixon Pyles (June 18, 1964), <https://content.wisconsinhistory.org/digital/collection/p15932coll2/id/7135> (on file with the *Columbia Law Review*) (civil rights organizer providing update on work of "the law students project" to track down petitioners).

115. See, e.g., Petition for Removal, *Mississippi v. Hartfield*, No. 1305 (S.D. Miss. filed June 26, 1964) (on file with the *Columbia Law Review*), and similar petitions filed in Nos. 1306–1341. Indeed, by the time the *Lefton* petitions were filed, almost 100 other removals had taken place across the district. See Petition for Removal, *Crawford v. Mississippi*, No. 3511 (S.D. Miss. filed June 22, 1964) (on file with the *Columbia Law Review*), and similar petitions filed in Nos. 3512–3522; Petition for Removal, *Brown v. City of Meridian*, No. 5151 (S.D. Miss. filed June 16, 1964) (on file with the *Columbia Law Review*), and similar petitions filed in Nos. 5152–5160; Petition for Removal, *Austin v. Mississippi*, No. 3437 (S.D. Miss. filed June 11, 1964) (on file with the *Columbia Law Review*) [hereinafter *Austin* Petition for Removal], and similar petitions filed in Nos. 3438–3510.

116. See *Austin* Petition for Removal, *supra* note 115, and similar petitions filed in Nos. 3438–3510. The local lawyers representing these petitioners were Carsie A. Hall and Jack H. Young. See, e.g., *Austin* Petition for Removal, *supra* note 115; see also Greenberg,

Jack Greenberg, successor to Thurgood Marshall as Director-Counsel of the NAACP Legal Defense and Education Fund, Inc. (LDF), was a pioneering civil rights litigator who argued several landmark cases before the U.S. Supreme Court during his career, including *Brown v. Board of Education* and *Griggs v. Duke Power Co.*¹¹⁷ He led LDF for more than two decades and described the genius of its legal team as having “the ability to be creative in matters of legal and social justice.”¹¹⁸ He was listed as counsel for 250 removed cases in Mississippi during the 1960s.¹¹⁹

At the time of these removals, Constance Baker Motley was already serving as the first Black woman in the New York Senate.¹²⁰ During her two-decade career as a civil rights litigator with LDF, she argued ten cases before the U.S. Supreme Court and led the litigation that resulted in James Meredith’s admission to the University of Mississippi.¹²¹ In 1966, she became the first Black woman appointed as a federal judge.¹²² She was listed as counsel for 153 removed cases.¹²³

Derrick Bell oversaw more than 300 school desegregation cases in Mississippi during his time at LDF, and he would go on to become the first tenured Black professor at Harvard Law School.¹²⁴ His scholarship,

supra note 85, at 368 (describing these lawyers’ work in coordination with the NAACP Legal Defense and Education Fund); supra note 96.

117. *Griggs v. Duke Power Co.*, 401 U.S. 424 (1971); *Brown v. Bd. of Educ.*, 347 U.S. 483 (1954); see also Theodore M. Shaw, *Tribute to Jack Greenberg*, 117 *Colum. L. Rev.* 1057, 1059–62 (2017); Richard Severo & William McDonald, *Jack Greenberg, A Courthouse Pillar of the Civil Rights Movement, Dies at 91*, *N.Y. Times* (Oct. 12, 2016), <https://www.nytimes.com/2016/10/13/us/jack-greenberg-dead.html> (on file with the *Columbia Law Review*) (last updated Oct. 19, 2016); Jack Greenberg, *Colum. L. Sch.*, <https://www.law.columbia.edu/faculty/jack-greenberg> [<https://perma.cc/CP3V-SKFW>] (last visited Sept. 19, 2023). For Greenberg’s own reflections on his work, see generally Greenberg, supra note 85.

118. Severo & McDonald, supra note 117 (internal quotation marks omitted) (quoting Greenberg); see also Steven L. Winter, *Jack!*, 117 *Colum. L. Rev.* 1069, 1072 (2017) (“Jack was a great legal tactician. Sometimes on a grand scale. Following the trail blazed by Charles Hamilton H[o]uston and Thurgood Marshall, LDF didn’t just bring cases; it engaged in well-planned campaigns.”).

119. Data on file with the *Columbia Law Review*. Greenberg was likely involved in many more cases; often only local counsel, see supra note 116, were listed on the dockets.

120. See Douglas Martin, *Constance Baker Motley, Civil Rights Trailblazer, Dies at 84*, *N.Y. Times* (Sept. 29, 2005), <https://www.nytimes.com/2005/09/29/nyregion/constance-baker-motley-civil-rights-trailblazer-dies-at-84.html> (on file with the *Columbia Law Review*) (last updated Oct. 5, 2005). For a recent biography of Motley, see generally Tomiko Brown-Nagin, *Civil Rights Queen: Constance Baker Motley and the Struggle for Equality* (2022).

121. Martin, supra note 120. For an overview of Motley’s work on Meredith’s case, see generally Denny Chin & Kathy Hirata Chin, *Constance Baker Motley, James Meredith, and the University of Mississippi*, 117 *Colum. L. Rev.* 1741 (2017).

122. See Raymond J. Lohier, Jr., *On Judge Motley and the Second Circuit*, 117 *Colum. L. Rev.* 1803, 1805 (2017).

123. Data on file with the *Columbia Law Review*. Motley was likely involved in many more cases. See supra note 119.

124. See Fred A. Bernstein, *Derrick Bell, Law Professor and Rights Advocate, Dies at 80*, *N.Y. Times* (Oct. 6, 2011), <https://www.nytimes.com/2011/10/06/us/derrick-bell->

developed over the course of several decades, included standard law school texts on race and the law and pioneering efforts in critical race theory.¹²⁵ He was listed as counsel for 143 removed cases.¹²⁶

Also on the cases were law professor Anthony G. Amsterdam and LDF lawyer Melvyn Zarr, who traveled to Mississippi on a request from Congress of Racial Equality (CORE) field-worker Michael Schwerner to assist the legal response to the jailing of CORE voting rights volunteers during the Freedom Summer project.¹²⁷ Amsterdam was a driving force behind the removal strategy, authoring the definitive scholarly treatment of the civil rights removal statute as well as a detailed litigation reference handbook for lawyers working in coordination with LDF in the South.¹²⁸ Almost every case among the hundreds removed between 1964 and 1966 involved various out-of-state counsel and the same handful of local counsel listed on each petition.¹²⁹

Together with local counsel, LDF represented in this first batch of removed cases a group of individuals arrested while attempting to register to vote in Canton, Mississippi.¹³⁰ After gathering at the Mount Zion Baptist Church, the prospective registrants proceeded in small groups from the church to the local courthouse, but they were stopped by police—already assembled with a truck for arrests—within blocks of the church lot.¹³¹ They were then arrested and taken away, one group after the other, and charged with various misdemeanors such as picketing and parading without a permit.¹³² The local counsel, one of only three members of the Mississippi Bar willing to represent criminal defendants in civil rights cases at the time,

pioneering-harvard-law-professor-dies-at-80.html (on file with the *Columbia Law Review*) (last updated Oct. 11, 2011).

125. See *id.*; see also, e.g., Derrick A. Bell, Jr., Case Comment, *Brown v. Board of Education* and the Interest-Convergence Dilemma, 93 Harv. L. Rev. 518 (1980).

126. Data on file with the *Columbia Law Review*. Bell was likely involved in many more cases. See *supra* note 119.

127. See Greenberg, *supra* note 85, at 369–70; Zarr, *supra* note 98, at 370–71 & n.12; *supra* note 1. Members of the Ku Klux Klan murdered Schwerner and activists James Chaney and Andrew Goodman on June 21, 1964. See Douglas O. Linder, Bending Toward Justice: John Doar and the “Mississippi Burning” Trial, 72 Miss. L.J. 731, 742–44 (2002). Their deaths drew national attention to the events of the summer of 1964 in Mississippi, and in what became known as the Mississippi Burning trial, Judge Cox presided over the prosecution of nineteen defendants charged by federal prosecutors with the crime. See *id.* at 749, 755–58.

128. See Anthony G. Amsterdam, The Defensive Transfer of Civil Rights Litigation From State to Federal Courts (n.d.) (reference handbook); Amsterdam, Federal Removal, *supra* note 13 (law review article).

129. Data on file with the *Columbia Law Review*.

130. See *Austin* Petition for Removal, *supra* note 115, and similar petitions filed in Nos. 3438–3510. These facts are alleged in each removal petition.

131. See *Austin* Petition for Removal, *supra* note 115, at 3.

132. See *id.* at 3–4, 6–7.

was repeatedly denied access to the defendants in jail, who were held under “excessive, exorbitant and discriminatory bail.”¹³³

The defendants were released on bond upon the removal of their cases to the Southern District of Mississippi; after briefing and a hearing on the matter, Judge Cox issued a five-page opinion and order remanding the cases, concluding that “no fact or circumstance” brought them under any removal statute.¹³⁴ As authorized by the Civil Rights Act, petitioners appealed to the Fifth Circuit, which reversed in light of its interpretation of the civil rights removal statute in *Rachel v. Georgia*.¹³⁵ In that case (one of many broader interpretations of the removal statute by appellate courts amid the renewed appealability of remand orders¹³⁶), the Fifth Circuit ruled that a district court must judge the adequacy of a removal petition’s facts consistent with the notice-pleading standard then applied to other forms of pleading under federal rules.¹³⁷ With the appeal of that case pending before the Supreme Court, the Fifth Circuit ordered the district court to stay the proceedings until the high court’s decision.¹³⁸

The journey of that litigation—the arrest of people exercising their civil rights, their release upon the removal of their case to federal court, the remand of their case after extensive hearings, the appeal of the remand order to the Fifth Circuit, and the staying of further proceedings pending the Supreme Court’s 1966 decisions on civil rights removal—is typical of hundreds of cases in Mississippi during the mid-1960s.¹³⁹

133. See *id.* at 2, 12. Bail reduction was a common component of the removal strategy. See, e.g., Sally Belfrage, *Freedom Summer* 132 (1965) (“While Claude Clayton, the federal judge for the northern half of the state, moved from town to town, the lawyers chased him with their documents and attempted to persuade him to grant the petitions [for removal] and lower excessive bail.”). For Sally Belfrage’s account of her experience in a Mississippi jail during Freedom Summer, see *id.* at 137–61.

134. See *Opinion & Order on Motion to Remand* at 4, *Austin v. Mississippi*, No. 3437 (S.D. Miss. remanded Oct. 20, 1964) (on file with the *Columbia Law Review*).

135. See *McGee v. City of Meridian*, 359 F.2d 846, 847 (5th Cir. 1966); *Rachel v. Georgia*, 342 F.2d 336, 339–42 (5th Cir. 1965). Amsterdam represented these petitioners on appeal.

136. See, e.g., *Cox v. Louisiana*, 348 F.2d 750, 754–55 (5th Cir. 1965); *Peacock v. City of Greenwood*, 347 F.2d 679, 682–84 (5th Cir. 1965); *Rachel*, 342 F.2d at 340–43. But see *New York v. Galamison*, 342 F.2d 255, 270–72 (2d Cir. 1965) (declining to reexamine the “restriction that had been judicially imposed on the first clause” of the removal statute and adopting a narrow construction of the second clause). These cases are summarized by the United States Commission on Civil Rights, U.S. Comm’n on C.R., *supra* note 82, at 132–35 (“These decisions indicate that the Federal courts have begun the process of reconsidering the earlier restrictive interpretations of section 1443, a step forward that Congress anticipated in 1964.”).

137. See *Rachel*, 342 F.2d at 340. Thus, because in these cases Judge Cox had not conducted an evidentiary hearing on the matter before remanding, his remand order was in error. *McGee*, 359 F.2d at 847.

138. See *McGee*, 359 F.2d at 847; *infra* section II.C (discussing the Supreme Court’s 1966 decisions).

139. See, e.g., Docket, *Allen v. Mississippi*, No. 3733 (S.D. Miss. filed Apr. 23, 1965) (on file with the *Columbia Law Review*), and similar dockets in Nos. 3734–3806; Docket, *Kaslo v.*

Especially striking are the hurdles that hindered civil rights removal's effectiveness even after *Lefton* and liberal appellate interpretations. Cases

Mississippi, No. 5219 (S.D. Miss. filed Mar. 2, 1965) (on file with the *Columbia Law Review*), and similar dockets in Nos. 5220–5234; Docket, *Parker v. City of Pascagoula*, No. 8358 (S.D. Miss. filed Aug. 13, 1964) (on file with the *Columbia Law Review*), and similar dockets in Nos. 8359–8426; Docket, *Miller v. Mississippi*, No. 8353 (S.D. Miss. filed July 14, 1964) (on file with the *Columbia Law Review*), and similar dockets in Nos. 8354–8355; Docket, *Brown v. City of Meridian*, No. 5151 (S.D. Miss. filed June 16, 1964) (on file with the *Columbia Law Review*), and similar dockets in Nos. 5152–5160.

Judge Cox criticized the quantity and quality of these cases in a letter to removal attorneys that also illustrates the (often-unsuccessful) role of bond reduction in the attorneys' removal strategy:

Both of [the defendants] filed petitions to remove [perjury] prosecutions to the United States District Court for the Hattiesburg Division of this District. Their applications were made to the Court under the rules to reduce the bonds of these petitioners. The bond of petitioner (Hancock) was not changed from \$5000 as fixed by the State Judge, but the bond of petitioner (Glenn) was reduced to \$3500 by reason of facts and circumstances in each case which prompted such decision. Hancock was released on cash bond on November 4, 1964. Glenn was released on cash bond on September 11, 1964.

. . . .

Actually civil rights and the magic word segregation are not in any way involved in any of these proceedings, but are obviously inserted in these petitions as ad hominem arguments to the Court in search of an ear radically attuned to such wave length. . . . It is significant to the Court that so many petitions in substantially the same wording, and appearing to have the same author, constantly appear before this Court to be made in loose fashion under oath with no substantial evidentiary support therefor.

Letter from Harold Cox, J., S.D. Miss., to James Finch & Leonard H. Rosenthal (Nov. 19, 1964) (on file with the *Columbia Law Review*) (discussing *Mississippi v. Hancock*, No. 1342 (S.D. Miss. filed July 13, 1964), and *Mississippi v. Glenn*, No. 1344 (S.D. Miss. filed Aug. 6, 1964)). The defendant in *Hancock*, a Freedom Summer volunteer working with SNCC, alleged in his removal petition that he was arrested and charged with perjury “in filling out a sworn written application for registration as a voter”; that the arrest “was solely for the purpose of discouraging and preventing him and other [Black people] in the State of Mississippi from registering to vote”; and that “[i]n furtherance of this purpose . . . Petitioner’s bail ha[d] been set at the exorbitant and unreasonable amount of \$5,000, and he ha[d] been incarcerated since April 10, 1964, without a trial date having been set and without a grand jury even having been impaneled to consider his alleged offense.” See Petition for Removal and for Other Relief at B-1, *Hancock*, No. 1342 (S.D. Miss. filed July 13, 1964) (on file with the *Columbia Law Review*). Five thousand dollars in April 1964 is equivalent to about fifty thousand dollars today. See CPI Inflation Calculator, Bureau of Lab. Stat., <https://data.bls.gov/cgi-bin/cpicalc.pl?cost1=5000&year1=196404&year2=202312> [<https://perma.cc/2H8L-4WXX>] (last visited Jan. 11, 2024).

An example of a Fifth Circuit order reversing the district court’s remand and staying proceedings pending the outcome of the Supreme Court cases is *Kaslo v. City of Meridian*, 360 F.2d 282 (5th Cir. 1966). Often the district court would stay its own remand orders pending disposition of relevant appeals before the Fifth Circuit. See, e.g., Order, *Mississippi v. Brumfield*, Nos. 3734–3806, 3819 (S.D. Miss. filed June 21, 1965) (on file with the *Columbia Law Review*) (staying in a single order the remand orders in seventy-four listed cases); Order, *Reeves v. City of Pascagoula*, Nos. 8359–8426 (S.D. Miss. filed June 12, 1965) (on file with the *Columbia Law Review*) (staying sixty-eight remand orders at once).

did not simply proceed as usual upon removal to federal court; rather, what regularly followed was a drawn-out process to adjudicate the validity of the removal, often involving several affidavits,¹⁴⁰ extensive briefing,¹⁴¹ and numerous hearings that included testimony from state government officials.¹⁴² The proper scope of the removal statute was in flux, and on appeal, the Fifth Circuit had little room to employ its view of the statute

140. See, e.g., Affidavit of Selby Bowling, President of the Bd. of Supervisors of Forrest Cnty., Miss., *Hancock*, No. 1342 (S.D. Miss. filed Aug. 31, 1964) (on file with the *Columbia Law Review*); Affidavit of James Dukes, Prosecuting Att’y of Forrest Cnty., Miss., *Hancock*, No. 1342 (S.D. Miss. filed Aug. 31, 1964) (on file with the *Columbia Law Review*); Affidavit of Clyde W. Easterling, Chancery Clerk of Forrest Cnty., Miss., *Hancock*, No. 1342 (S.D. Miss. filed Aug. 31, 1964) (on file with the *Columbia Law Review*); Affidavit of James Finch, Dist. Att’y for Twelfth Jud. Dist. of the State of Miss., *Hancock*, No. 1342 (S.D. Miss. filed Aug. 31, 1964) (on file with the *Columbia Law Review*); Affidavit of W.G. Gray, Sheriff of Forrest Cnty., Miss., *Hancock*, No. 1342 (S.D. Miss. filed Aug. 31, 1964) (on file with the *Columbia Law Review*); Affidavit of Theron C. Lynd, Cir. Clerk of Forrest Cnty., Miss., *Hancock*, No. 1342 (S.D. Miss. filed Aug. 31, 1964) (on file with the *Columbia Law Review*). The *Hancock* docket indicates that depositions of half of these officials were taken on December 28, 1964. For additional examples of the use of affidavits in removal adjudications, see, e.g., Affidavit of Joe N. Pigott, Dist. Att’y for Pike Cnty., Miss., *Parker v. Mississippi*, No. 3629 (S.D. Miss. filed Jan. 27, 1965) (on file with the *Columbia Law Review*); Affidavit of R.R. Warren, Sheriff of Pike Cnty., Miss., *Parker*, No. 3629 (S.D. Miss. filed Jan. 27, 1965) (on file with the *Columbia Law Review*); Affidavit of H.G. Hause, Captain of Police & Chief Clerk of Mun. Ct. of City of Jackson, Miss., *Poole v. City of Jackson*, No. 3393 (S.D. Miss. filed Oct. 25, 1963) (on file with the *Columbia Law Review*).

141. See, e.g., Petitioner’s Brief in Opposition to Respondent’s Motion to Remand, *City of Meridian v. Golick*, No. 5210 (S.D. Miss. n.d.) (on file with the *Columbia Law Review*) (brief by Jack Greenberg’s team opposing remand); Brief for Movant, *Golick*, No. 5210 (S.D. Miss. n.d.) (on file with the *Columbia Law Review*) (brief by the City of Meridian supporting remand); see also, e.g., Petitioners’ Memorandum in Support of Their Petitions for Removal, *City of Meridian v. Smith*, No. 5240 (S.D. Miss. filed Apr. 11, 1966) (on file with the *Columbia Law Review*); Memorandum Brief on Behalf of the City of Meridian, *Smith*, No. 5240 (S.D. Miss. filed Apr. 11, 1966) (on file with the *Columbia Law Review*). The city and petitioners filed identical briefs in *City of Meridian v. Harris*, No. 5243 (S.D. Miss. filed Apr. 11, 1966) (on file with the *Columbia Law Review*), *City of Meridian v. Sours*, No. 5242 (S.D. Miss. filed Apr. 11, 1966) (on file with the *Columbia Law Review*), and *City of Meridian v. Sumrall*, No. 5241 (S.D. Miss. filed Apr. 11, 1966) (on file with the *Columbia Law Review*).

142. See, e.g., Subpoena of Roy K. Moore, Agent in Charge of Jackson, Miss., Off. of the FBI, *City of McComb v. Lee*, No. 3589 (S.D. Miss. Oct. 13, 1964) (on file with the *Columbia Law Review*); Subpoena of “Bud” Gray, Sheriff of Forrest Cnty., Miss., *Mississippi v. Hartfield*, No. 1305 (S.D. Miss. Aug. 4, 1964) (on file with the *Columbia Law Review*); Subpoena of Clyde W. Easterling, Chancery Clerk of Forrest Cnty., Miss., *Hartfield*, No. 1305 (S.D. Miss. Aug. 4, 1964) (on file with the *Columbia Law Review*); List of Exhibits and Witnesses, *Poole*, No. 3393 (S.D. Miss. Oct. 25, 1963) (on file with the *Columbia Law Review*) (listing as a witness “Allen Thompson, Mayor of the City of Jackson, Mississippi”); Transcript at 2, *Brown v. Mississippi*, No. 3196 (S.D. Miss. Aug. 14, 1961) (on file with the *Columbia Law Review*) (listing as appearing attorney “Joe T. Patterson, Esq., Attorney General, State of Mississippi”); see also, e.g., Transcript, *Mississippi v. Miller*, No. 8353 (S.D. Miss. Sept. 21, 1964) (on file with the *Columbia Law Review*) (more-than-250-page hearing transcript); Transcript, *Poole*, No. 3393 (S.D. Miss. Jan. 8, 1964) (on file with the *Columbia Law Review*) (nearly 200-page hearing transcript).

because proceedings in most removed cases were stayed pending the outcomes of the cases before the Supreme Court.

Of the 2,297 criminal cases filed in federal courts in Mississippi from 1964 through 1966, removals under 28 U.S.C. § 1443 accounted for 1,136 (49.5%).¹⁴³ Indeed, civil rights removals accounted for 1,114 of 1,871 criminal cases (59.5%) filed between the Fifth Circuit's decision in *Lefton* (June 1964) and the Supreme Court's decisions in *Rachel* and *Peacock* (June 1966). During the three preceding years (1961–1963), the same federal courts saw 8 removals out of 1,315 criminal cases (0.6%). During the three subsequent years (1967–1969), there were 1,155 criminal cases and 57 removals (4.9%). The overall number of criminal cases in Mississippi federal courts practically doubled from 1964 through 1966 compared to the three-year periods before and after. The Southern District in particular saw 715 removals among 1,337 criminal cases from 1964 through 1966, of which 623 were remanded. Almost all remanded cases were appealed: 432 appeals were docketed, and most remaining cases were stayed pending the resolution of a related appeal. Of those 432, the Fifth Circuit dismissed 58 cases and held 374 pending the Supreme Court's decisions.

After the Supreme Court's very narrow rulings in June 1966, discussed in section II.C, the Fifth Circuit affirmed the district court's remand orders in all 374 cases, sending each one back to state court.¹⁴⁴ There, prejudicial procedures and unfriendly juries likely nullified any sense of justice that those defendants might have enjoyed in a federal forum had the hope Congress breathed into the removal statute resulted in a stable, easily applied tool for civil rights litigants.¹⁴⁵ Instead, without clear direction, that breath of hope prompted widespread confusion, significant disputes, and an overwhelming caseload that created chaos in the lower courts.

C. *Restriction Restored*

The Supreme Court's first chance to review the civil rights removal statute amid this revolution in civil rights lawyering brought removal's moment to a crashing halt, ending lower-court chaos but also eliminating removal's potential as a prejudice-checking civil rights tool. Congress openly anticipated reconsideration of the *Strauder–Rives* doctrine when it reinstated appellate review of civil rights remand orders in 1964,¹⁴⁶ and the

143. See *infra* Appendix A. Additional data underlying the statistics in this paragraph are on file with the *Columbia Law Review*.

144. Data on file with the *Columbia Law Review*; see also, e.g., *Lee v. City of McComb*, No. 22751 (5th Cir. Nov. 15, 1966) (on file with the *Columbia Law Review*) (affirming district court's remand order in a one-sentence decision “[o]n the authority of *The City of Greenwood vs. Peacock*, 384 U.S. 808”), *aff'g Order, Lee*, No. 3589 (S.D. Miss. filed Oct. 7, 1964) (on file with the *Columbia Law Review*).

145. See *supra* notes 95–97 and accompanying text.

146. See *Amsterdam, Federal Removal*, *supra* note 13, at 911; *supra* section II.A.

question landed before the Court within two years.¹⁴⁷ In *Georgia v. Rachel* and *City of Greenwood v. Peacock*, decided on the same day in opinions authored by Justice Potter Stewart, the Court distinguished two removal attempts involving groups of Black defendants seeking service at restaurants and engaging in voter registration activities, respectively.¹⁴⁸ The result was an interpretation of the statute just as narrow as the Court's 1880 decisions, nullifying the statute's utility once again less than two years after its revitalization.

Thomas Rachel and nineteen others were indicted under a Georgia criminal trespass statute after they were denied service at Atlanta restaurants open to the public and refused to leave.¹⁴⁹ They removed their cases to the Northern District of Georgia under the civil rights removal statute, and the Fifth Circuit upheld the removals in light of the Civil Rights Act of 1964, a federal "law providing for . . . equal civil rights."¹⁵⁰

Reviewing that decision, the Supreme Court conducted a detailed analysis of the removal statute's development and its nineteenth-century interpretations.¹⁵¹ Summarizing with apparent approval *Strauder, Rives*, and their progeny, the Court resolved not to revisit what it means to be denied or unable to enforce one's rights,¹⁵² but it did address for the first

147. See *City of Greenwood v. Peacock*, 384 U.S. 808 (1966); *Georgia v. Rachel*, 384 U.S. 780 (1966). These cases, both appeals from Fifth Circuit decisions, involved the Court's first review of the civil rights removal statute in sixty years. See *supra* notes 60–61 and accompanying text.

148. See *Peacock*, 384 U.S. at 810–14 (summarizing relevant facts); *Rachel*, 384 U.S. at 782–85 (same). Note the parallel to *Strauder* and *Rives*, another pair of distinguishable removal cases decided on the same day in opinions authored by the same Justice in which the Court imposed severe, long-lasting limitations on civil rights removal's practical utility. See *supra* section I.B.

149. *Rachel*, 384 U.S. at 782–83.

150. See *Rachel v. Georgia*, 342 F.2d 336, 342–43 (5th Cir. 1965) (internal quotation marks omitted) (quoting 28 U.S.C. § 1443(1) (1964)). The Supreme Court had ruled in *Hamm v. City of Rock Hill*, 379 U.S. 306 (1964), that the Civil Rights Act of 1964 "precludes state trespass prosecutions for peaceful attempts to be served upon an equal basis in establishments covered by the Act." *Rachel*, 384 U.S. at 785.

151. See *Rachel*, 384 U.S. at 786–804.

152. See *id.* at 794–804. The Court seemed to justify retaining the *Strauder–Rives* doctrine based on the lack of substantive changes to the statute since those decisions. See *id.* at 802 ("[F]or the purposes of the present case, we are dealing with the same statute that confronted the Court in the cases interpreting [13 Rev. Stat.] § 641.").

The Court did read one sentence in *Rives* to suggest that a defendant can show denial on some basis "equivalent" to a facially discriminatory state law. See *id.* at 804. This indication is found in the *Rives* Court's assertion that the denial of rights within the meaning of the removal provision "is primarily, *if not exclusively*, a denial . . . resulting from the Constitution or laws of the State." See *id.* (internal quotation marks omitted) (quoting *Virginia v. Rives*, 100 U.S. 313, 319 (1880)). But the *Rachel* Court provided no explanation of what that basis might look like beyond the "narrow circumstances" of the present case, in which it ruled that the Civil Rights Act of 1964's explicit "substitut[ion] [of] a right for a crime" made prosecution of the defendants under the Georgia trespass statute—though

time which rights in particular enable civil rights removal. Narrowly construing the statute’s language and legislative history, the Court ruled that the only “law[s] providing for equal civil rights” that may enable removal under this statute are those “providing for specific civil rights stated in terms of racial equality.”¹⁵³ As a result, no party may trigger civil rights removal based on the denial of constitutional rights because “the guarantees of those clauses are phrased in terms of general application available to all persons or citizens, rather than in the specific language of racial equality that § 1443 demands.”¹⁵⁴ Any federal civil rights statute addressing concerns other than race, many of which Congress enacted after this decision, suffers the same fate.¹⁵⁵

Peacock likewise answered Congress’s call to revitalize civil rights removal by reaffirming the *Strauder–Rives* doctrine. The case involved a series of removals by two groups of defendants who alleged that they were denied or could not enforce their federal rights in Mississippi state courts.¹⁵⁶ The first group included fourteen individuals engaged in a voter registration drive who were confronted and charged with obstructing public streets in the City of Greenwood.¹⁵⁷ The second group consisted of fifteen people who claimed that their arrests and various charges were for the “sole purpose and effect of harassing Petitioners and of punishing them for and deterring them from the exercise of their constitutionally protected right to protest the conditions of racial discrimination and segregation” in Mississippi.¹⁵⁸ In both instances, the Northern District of Mississippi remanded the cases back to state court, and the Fifth Circuit reversed on the ground that removal was proper on allegations of the

not discriminatory on its face—a denial of that federal right. See *id.* at 804–05 (quoting *Hamm*, 379 U.S. at 314).

153. See *Rachel*, 384 U.S. at 785, 789–92.

154. *Id.* at 792. The Court ultimately upheld the removals based on the Civil Rights Act of 1964, which it said “plainly qualifies” as a law specifically providing for racial equality. See *id.* at 792–93.

155. See, e.g., *Johnson v. Mississippi*, 421 U.S. 213 (1975); *City of Greenwood v. Peacock*, 384 U.S. 808, 847 (1966) (Douglas, J., dissenting) (pointing out that under the Court’s reasoning, state action designed to punish or deter the exercise of rights under the Voting Rights Act of 1965 does not constitute a denial of equal civil rights enabling removal); *Vlaming v. W. Point Sch. Bd.*, 10 F.4th 300, 308–11 (4th Cir. 2021) (rejecting civil rights removal because Title IX of the Education Amendments of 1972 addresses sex discrimination rather than racial discrimination). For discussion of *Johnson*, see *infra* notes 168–173 and accompanying text.

156. See *Peacock*, 384 U.S. at 810–14 (majority opinion). These were among the first removals of criminal cases in Mississippi during the 1960s. See *infra* Appendix A.

157. *Peacock*, 384 U.S. at 810–12.

158. *Id.* at 812–14 (internal quotation marks omitted) (quoting the defendants’ petitions for removal).

discriminatory *application* of state laws such that “the arrest and charge under the statute were effected for reasons of racial discrimination.”¹⁵⁹

The Supreme Court rejected the Fifth Circuit’s reasoning in a 5-4 decision, saying it is insufficient “to allege or show that the defendant’s federal equal civil rights have been illegally and corruptly denied by state administrative officials in advance of trial, that the charges against the defendant are false, or that the defendant is unable to obtain a fair trial in a particular state court.”¹⁶⁰ The civil rights removal statute, the Court said, “does not require and does not permit the judges of the federal courts to put their brethren of the state judiciary on trial.”¹⁶¹ Removal depends instead on a clear showing that by reason of state law, a defendant’s federal rights (expressed in a federal statute addressing racial equality) “will inevitably be denied by the very act of bringing the defendant to trial in the state court.”¹⁶²

The Court proceeded to expressly reaffirm the *Strauder–Rives* doctrine¹⁶³ and suggest various other remedies available to defendants in this position.¹⁶⁴ It also teased out, in light of the “phenomenal increase” in criminal cases removed to federal court between 1963 and 1965, a future in which federal courts would be overwhelmed by cases “on any charge from a five-dollar misdemeanor to first-degree murder,” in which questions of choice of law and prosecutorial authority abound, and in

159. See *id.* (internal quotation marks omitted) (quoting *Peacock v. City of Greenwood*, 347 F.2d 679, 684 (5th Cir. 1965)); *Weathers v. City of Greenwood*, 347 F.2d 986, 986 (5th Cir. 1965) (per curiam) (reversing remand of the second group of cases on the same ground as the first group); *Peacock*, 347 F.2d at 684 (reversing remand of the first group of cases).

160. *Peacock*, 384 U.S. at 827.

161. *Id.* at 828.

162. *Id.* Accordingly, since (1) “no federal law confers an absolute right on private citizens—on civil rights advocates, on [Black people], or on anybody else—to obstruct a public street, to contribute to the delinquency of a minor, to drive an automobile without a license, or to bite a policeman” (some of the charges against defendants in this case) and (2) “no federal law confers immunity from state prosecution on such charges,” civil rights removal was not available to these defendants. See *id.* at 826–27, 831.

The Court also construed the second subsection of the removal statute, concluding that it “confers a privilege of removal only upon federal officers or agents and those authorized to act with or for them in affirmatively executing duties under any federal law providing for equal civil rights.” See *id.* at 814–24 (citing 28 U.S.C. § 1443(2) (1964)).

163. See *id.* at 831. While the Court stressed that it “need not and do[es] not necessarily approve or adopt all the language and all the reasoning of every one of this Court’s opinions construing this removal statute,” it emphasized that “those decisions were correct in their basic conclusion that the provisions of § 1443(1) do not operate to work a wholesale dislocation of the historic relationship between the state and the federal courts in the administration of the criminal law.” *Id.*

164. See *id.* at 828–30 (highlighting federal habeas corpus and federal injunctions against state proceedings). Removal is ordinarily preferable for civil rights litigants because it happens early in the case and “brings not only the federal issue but the entire case into the preferred federal forum.” See Fallon et al., *supra* note 24, at 860.

which “hundreds of new federal judges and other federal court personnel would have to be added in order to cope with the vastly increased caseload that would be produced.”¹⁶⁵ Congress, the Court emphasized, could surely provide for such a system, and that was the point: “[I]f changes are to be made in the long-settled interpretation of the provisions of this century-old removal statute, it is for Congress and not for this Court to make them.”¹⁶⁶

As with *Strauder* and *Rives* in the nineteenth century, the Supreme Court’s narrow interpretation of the civil rights removal statute in *Rachel* and *Peacock* rendered the provision practically useless for the foreseeable future.¹⁶⁷ The Court applied its interpretation a decade later in *Johnson v. Mississippi*,¹⁶⁸ organizing its doctrine into a two-prong test¹⁶⁹ and rejecting

165. See *Peacock*, 384 U.S. at 832–34.

166. *Id.* In a powerful dissent joined by Chief Justice Earl Warren and Justices William J. Brennan and Abe Fortas, Justice William O. Douglas called for the Court to overrule the *Strauder–Rives* doctrine. See *id.* at 835–54 (Douglas, J., dissenting). Tracing the history of removal from the Judiciary Act of 1789, he argued that “the federal regime was designed from the beginning to afford some protection against local passions and prejudices by the important pretrial federal remedy of removal.” *Id.* at 836. He explained:

First, a federal fact-finding forum is often indispensable to the effective enforcement of [federal civil rights] guarantees against local action. The federal guarantee turns ordinarily upon contested issues of fact. Those rights, therefore, will be of only academic value in many areas of the country unless the facts are objectively found. Secondly, swift enforcement of the federal right is imperative if the guarantees are to survive and not be slowly strangled by long, drawn-out, costly, cumbersome proceedings which the Congress feared might result in some state courts. The delays of state criminal process, the perilous vicissitudes of litigation in the state courts, the onerous burdens on the poor and the indigent who usually espouse unpopular causes—these threaten to engulf the federal guarantees. It is in that light that 28 U.S.C. § 1443(1) should be read and construed.

Id. at 839–40 (footnote omitted). Justice Douglas proposed distinguishing the terms “is denied” and “cannot enforce” in the removal statute, with the former enabling removal amid a “*present* deprivation of rights” and the latter amid an “*anticipated* state court frustration of equal civil rights.” *Id.* at 841. Accordingly, “[w]hatever the correctness of [*Rives* and its progeny] as to the ‘cannot enforce’ clause, they have no application whatever to a claim of a present denial of equal civil rights.” *Id.* at 842 (quoting 28 U.S.C. § 1443(1)).

167. See *supra* notes 58–61 and accompanying text; *supra* section II.B.2; see also Greenberg, *supra* note 85, at 379 (“[By then] virtually no movement people were being prosecuted under segregation laws. Prosecutions were for breach of the peace, parading without a permit, traffic offenses, trespass, and so forth. These were prosecutions for civil rights activity, but in the guise of general criminal law enforcement and, therefore, not removable.”).

168. 421 U.S. 213 (1975).

169. The Court said that a removal petition under 28 U.S.C. § 1443(1) must satisfy two requirements:

First, it must appear that the right allegedly denied the removal petitioner arises under a federal law “providing for specific civil rights stated in terms of racial equality.” Claims that prosecution and conviction will violate rights under constitutional or statutory provisions of general applicability

the availability of removal for a group of defendants who were charged under state law after encouraging the boycott of Vicksburg, Mississippi, merchants that discriminated in hiring practices.¹⁷⁰ It ruled that a provision of the Civil Rights Act of 1968 prohibiting forceful interference with federally protected civil rights activities was not a law providing for equal civil rights within the meaning of the removal statute because “it evinces no intention to interfere in any manner with state criminal prosecutions.”¹⁷¹ In other words, because the Act criminalized violations of federal civil rights enacted in separate legislation but did not itself provide any substantive rights, defendants in state trials could not use it as a basis for civil rights removal.¹⁷² This case—indicative of how the Court’s suffocative interpretation had once again rendered civil rights removal

or under statutes not protecting against racial discrimination, will not suffice. . . .

Second, it must appear . . . that the removal petitioner is “denied or cannot enforce” the specified federal rights “in the courts of [the] State.” This provision normally requires that the “denial be manifest in a formal expression of state law,” such as a state legislative or constitutional provision, “rather than a denial first made manifest at the trial of the case.” Except in the unusual case where “an equivalent basis could be shown for an equally firm prediction that the defendant would be ‘denied or cannot enforce’ the specified federal rights in the state court,” it was to be expected that the protection of federal constitutional or statutory rights could be effected in the pending state proceedings, civil or criminal.

Id. at 219–20 (alteration in original) (citations omitted) (first, fourth, fifth, and sixth quotations quoting *Georgia v. Rachel*, 384 U.S. 780, 792, 799, 803–04 (1966); second and third quotations quoting 28 U.S.C. § 1443(1)).

170. See *id.* at 215–16, 222.

171. See *id.* at 222–27. The provision is now located at 18 U.S.C. § 245 (2018).

172. In dissent, Justice Marshall, joined by Justice Brennan, endorsed the interpretation of the removal statute supplied by Justice Douglas’s dissent in *Peacock*. See *id.* at 229 (Marshall, J., dissenting) (citing *City of Greenwood v. Peacock*, 384 U.S. 808, 840–48 (1966) (Douglas, J., dissenting)); *supra* note 166. Justice Douglas, still on the Court, did not participate in this case due to a debilitating stroke in December 1974. See Warren Weaver Jr., *Douglas’s Stroke Affects Left Arm; Doctors Report No Evidence of Mental Impairment*, N.Y. Times, Jan. 3, 1975, at 25. Justice Marshall also explained in detail why the contested provision of the Civil Rights Act of 1968 nevertheless meets the requirements of *Rachel* and *Peacock*. See *Johnson*, 421 U.S. at 229–39 (Marshall, J., dissenting). Five Fifth Circuit judges made a similar argument below. See *Johnson v. Mississippi*, 491 F.2d 94, 94–95 (5th Cir. 1974) (Brown, C.J., dissenting from denial of petition for rehearing en banc).

In response to the Court’s reemphasis of other remedies available to defendants in this position, *Johnson*, 421 U.S. at 228, Justice Marshall concluded:

The possibility that the petitioners might be vindicated in state-court criminal actions or through subsequent habeas corpus relief will do little to restore what has been lost: the right to engage in legitimate, if unpopular, protest without being subjected to the inconvenience, the expense, and the ignominy of arrest and prosecution. If the federal courts abandon persons like the petitioners in this case without a fair hearing on the merits of their claims, then in my view comity will have been bought at too great a cost.

Id. at 239 (Marshall, J., dissenting).

(and the immediate recognition of federal rights it enables) practically unavailable—is the Supreme Court’s most recent examination of the statute.¹⁷³

III. THE TWENTY-FIRST CENTURY: CIVIL RIGHTS REMOVAL’S LASTING POTENTIAL

As made clear by its text and history, civil rights removal is a jumbled mess. The statute itself is unclear,¹⁷⁴ the judicial decisions attempting to make sense of it have rendered it practically useless,¹⁷⁵ and its one period of utility was accordingly fraught with confusion.¹⁷⁶ Even if fully realized as a forum choice tool for circumstances with a heightened risk of discriminatory judicial treatment, it would likely benefit only a small group of defendants. But the Mississippi case study reveals why that small group is worth such special attention.¹⁷⁷ Indeed, it reveals civil rights removal’s enduring potential as an institutional check against the prejudices—some subtle, some explicit—that arise in each generation and obscure the proper administration of justice. Such checks are hallmarks of our system of government, and it is well past time to reform civil rights removal to secure its utility for generations to come.

This Part makes the case for revitalizing civil rights removal in the twenty-first century. Section III.A discusses the role of civil rights removal in our federal system. Section III.B explores the form that a modernized statute might take, suggests how it might be adopted, and notes arguments that expanding civil rights removal is disruptive of the state–federal balance.

A. *Removal’s Role*

Civil rights removal fills a gap in our federal system. Ordinarily, defendants with federal claims may seek federal review of state court decisions only after exhausting available state appeals and only through discretionary review by writ of certiorari from the Supreme Court.¹⁷⁸

173. Federal courts of appeals, despite disagreeing with the Court’s interpretation, apply the *Rives–Peacock* doctrine to this day. See, e.g., *Vlaming v. W. Point Sch. Bd.*, 10 F.4th 300, 310 (4th Cir. 2021).

174. See *supra* note 3 (text of the statute); *supra* notes 32–33 and accompanying text.

175. See *supra* section I.B (nineteenth-century interpretations); *supra* section II.C (twentieth-century interpretations).

176. See *supra* section II.B.

177. Lacking the data but sharing the sentiment, the dissenting Justices in the Supreme Court’s cases amid the aftermath of that moment in Mississippi argued as much in their opinions. See *supra* note 166 (discussing Justice Douglas’s dissent in *Peacock*); *supra* note 172 (discussing Justice Marshall’s dissent in *Johnson*).

178. Jonathan R. Siegel, *Habeas, History, and Hermeneutics*, 64 *Ariz. L. Rev.* 505, 513 (2022). Before 1988, the Supreme Court had mandatory jurisdiction by appeal to review decisions of state high courts that upheld a state statute against federal constitutional or

Indeed, federal law prohibits lower federal courts from reviewing state court decisions absent explicit congressional authorization.¹⁷⁹ Defendants convicted in state criminal cases may seek a writ of habeas corpus from a federal district court, but that doctrine involves its own series of constraints and also typically requires exhausting state remedies.¹⁸⁰ The reality is that state defendants have no right to federal review if their case remains in the state system; such review is entirely discretionary and most often confined to the Supreme Court.¹⁸¹ And since defendants usually have no choice over the forum in which litigation is initiated against them, they generally have no opportunity to raise a claim of denial of federal rights in a forum different from the one in which the denial allegedly occurred until they exhaust all state remedies.

Removal is Congress's answer to that quandary. As discussed in Part I, Congress provided for removal jurisdiction as early as 1789 to enable a defendant to defeat the plaintiff's forum choice in specified circumstances.¹⁸² As a result, "the plaintiff chooses the initial court in which to file the claim subject, whenever federal jurisdiction is available, to the defendant's right to rely on the removal statutes' authority."¹⁸³ Removal brings the entire case into the appropriate federal forum before trial, placing the defendant in front of a federal judge without potentially years of litigation—and in criminal cases, confinement—before getting the chance to seek discretionary review of a final state judgment.¹⁸⁴ The removal right does not circumvent the state court's "superior" claim to adjudicate the case because the plaintiff's power to choose the forum is not superior to the defendant's power to remove.¹⁸⁵ Congress has structured the system to expressly permit defendants to employ removal as a "significant counterbalance" to the principle that the plaintiff is the master of their claim.¹⁸⁶

statutory challenge. See 28 U.S.C. § 1257(2) (1982). Congress eliminated such appeals by right in the Supreme Court Case Selections Act of 1988, Pub. L. No. 100-352, 102 Stat. 662, leaving the Court with only discretionary review by writ of certiorari, see 28 U.S.C. § 1257(a) (2018).

179. See *D.C. Ct. of Appeals v. Feldman*, 460 U.S. 462, 486 (1983); *Rooker v. Fid. Tr. Co.*, 263 U.S. 413, 415–16 (1923); see also *Exxon Mobil Corp. v. Saudi Basic Indus. Corp.*, 544 U.S. 280, 283 (2005) (clarifying that the *Rooker-Feldman* doctrine stems from 28 U.S.C. § 1257).

180. See 28 U.S.C. § 2254(b)(1)(A); Fallon et al., *supra* note 24, at 860; Siegel, *supra* note 178, at 513–16 (discussing the current model of habeas corpus as a "constrained certiorari substitute").

181. See Amsterdam, *Federal Removal*, *supra* note 13, at 857 n.241.

182. See Bassett & Perschbacher, *supra* note 13, at 3–6; *supra* notes 13–17 and accompanying text.

183. Bassett & Perschbacher, *supra* note 13, at 3–6.

184. See Fallon et al., *supra* note 24, at 860.

185. See Bassett & Perschbacher, *supra* note 13, at 3–6.

186. See *id.*

Civil rights removal, like its federal officer counterpart,¹⁸⁷ is an expression of a specific circumstance in which Congress has chosen to impose that balance in the state–federal system. Its enactment separate from the general removal provision is necessary because there are instances in which defendants seeking to invoke civil rights removal would not otherwise be eligible to remove at all (leaving them in the quandary described above).¹⁸⁸ The statute that enables it is poorly drafted,¹⁸⁹ but its purpose is clear: to enable anticipatory federal jurisdiction—and with it special national attentiveness—over federal civil rights claims. Far from an unbridled intrusion into state affairs, civil rights removal jurisdiction provides defendants with a tool that neutralizes the generally stark imbalance in forum choice doctrine. Indeed, especially in criminal cases, for which the initial forum is almost always the state and federal intervention is most limited, civil rights removal cures a fundamental imbalance in our federal system.

Congress’s decision to privilege civil rights litigants with this forum choice (over many other litigants with federal defenses for whom removal is unavailable) arises from its recognition that subtle prejudices are more likely to influence the administration of justice in cases involving minority groups.¹⁹⁰ These prejudices can be difficult to detect, especially after the fact, which partly explains why the *Rives–Peacock* interpretation of the removal statute is so confounding. Facial state denials of federal rights are

187. The relevant text of the current federal officer removal statute reads:

(a) A civil action or criminal prosecution that is commenced in a State court and that is against or directed to any of the following may be removed by them to the district court of the United States for the district and division embracing the place wherein it is pending:

(1) The United States or any agency thereof or any officer (or any person acting under that officer) of the United States or of any agency thereof, in an official or individual capacity, for or relating to any act under color of such office or on account of any right, title or authority claimed under any Act of Congress for the apprehension or punishment of criminals or the collection of the revenue.

28 U.S.C. § 1442 (2018); see also *supra* notes 23–26 and accompanying text.

188. The general removal statute enables removal in almost all instances in which the state and federal court have concurrent jurisdiction. See 28 U.S.C. § 1441(a). The most notable exception is that removal is not available when the federal court has only diversity jurisdiction and a defendant is a citizen of the state in which the plaintiff initiated the action. See *id.* § 1441(b)(2). The civil rights removal statute, in contrast, enables removal of cases that lack concurrent jurisdiction (e.g., cases involving only state claims or cases with no diversity jurisdiction). See *id.* § 1443.

189. See *supra* note 3 (text of the statute); *supra* notes 32–33 and accompanying text.

190. See Amsterdam, *Federal Removal*, *supra* note 13, at 803 (“[In] cases involving civil rights, ‘Congress has declared the historic judgment that . . . there is to be no slightest risk of nullification by state process.’ . . . [It] commanded federal trial courts to anticipate and supersede state court trials for the complete and timely enforcement of interests ‘of the highest national concern.’” (quoting Herbert Wechsler, *Federal Jurisdiction and the Revision of the Judicial Code*, 13 *Law & Contemp. Probs.* 216, 230 (1948))).

rare and more easily corrected by the Supreme Court on discretionary review;¹⁹¹ it is when “the denial rests instead on hidden, stubborn administrative discrimination, when assessment and correction depend on unbiased, careful fact-finding, and when an inadequate record effectively immunizes the denial from appellate correction” that civil rights removal jurisdiction is most needed.¹⁹² Prejudices also fluctuate over time, between judges, and across forums.¹⁹³ Indeed, it may often be the case that—compared to the state forum in which litigation begins—the federal forum available to a defendant is just as or even more unlikely to afford the full protections of federal law.¹⁹⁴ Forum choice thus becomes a critical determination unique to the circumstances of each case, and civil rights removal operationalizes Congress’s belief that a defendant subject to potential prejudice should have greater say over the forum in which their case proceeds.

B. *Reform*

As currently drafted and interpreted, the civil rights removal statute does not serve the purposes behind Congress’s original provision of civil rights removal jurisdiction. A modernized statute must restore civil rights removal’s forum-choice-allocating role in the federal system while avoiding the pitfalls underlying the Supreme Court’s 1966 interpretation

191. But eliminating mandatory review of state judgments upholding state laws against federal challenge heightens removal’s value to defendants. See *supra* note 178 and accompanying text.

192. Schmidt, *supra* note 17, at 1436; see also Amsterdam, Federal Removal, *supra* note 13, at 857–58 (“This is the case where local prejudice, local resistance, pitch the risk of error, always incident in fact finding, strongly against federal contentions” (footnote omitted)); Martin H. Redish, Reassessing the Allocation of Judicial Business Between State and Federal Courts: Federal Jurisdiction and “The Martian Chronicles”, 78 Va. L. Rev. 1769, 1778 (1992) (viewing favorably the litigant-choice justification for removal jurisdiction in situations “[w]here a particular substantive federal right is given to a group deemed by Congress to be in special need of protection”). Justice Douglas also endorsed this justification for civil rights removal jurisdiction in his *Peacock* dissent. See *supra* note 166.

193. See *City of Greenwood v. Peacock*, 384 U.S. 808, 839 (1966) (Douglas, J., dissenting) (“[Those] subject [to] repression are not only those who espouse the cause of racial equality. Jehovah’s Witnesses . . . have likewise felt the brunt of majoritarian control Before them were the labor union organizers. Before them were [East Asian immigrants]. It is in this setting that the removal jurisdiction must be considered.”). It appears that Justice Douglas borrowed this language almost verbatim from Professor Amsterdam’s 1965 treatment of civil rights removal. See Amsterdam, Federal Removal, *supra* note 13, at 840 (adding the “Unionists” and “Cherokees” to this list of defendants dependent on the Constitution but generally unable to secure its guarantees without federal anticipatory jurisdiction).

194. See, e.g., *supra* section II.B (highlighting Judge Cox’s resistance to civil rights removal and his clashes with petitioners); see also Amsterdam, Federal Removal, *supra* note 13, at 837 n.186 (“[Some federal judges] are more hostile to certain federal rights than the mine run of state judges; and, of course, there are individual state judges who are more sensitive to federal rights than the mine run of the federal district bench.”).

of the statute.¹⁹⁵ An eligible defendant should have the choice to shift litigation against them to a federal forum without showing a facial state denial of race-based federal rights, but their removal should not trigger a lengthy trial-within-a-trial that requires the federal court to produce findings about the latent prejudices of its state brethren.¹⁹⁶ In short, modern civil rights removal should empower defendants with forum choice in a set of clearly prescribed circumstances implicating civil rights.

1. *Form.* — Modern civil rights removal could take multiple forms. Given the extent to which the Supreme Court’s current interpretation of the statute diverges from the text,¹⁹⁷ 28 U.S.C. § 1443 is arguably ripe for reinterpretation. Some of the Court’s recent decisions, such as *Bostock v. Clayton County*,¹⁹⁸ suggest that contemporary textual methods of statutory interpretation may lead the Court to abandon several of the requirements that it has previously read into the statute. Nowhere does the statute’s text, for instance, require a defendant to show that the denial of their federal rights arose from a facially discriminatory state law,¹⁹⁹ nor does it limit the federal rights justifying removal to substantive statutory rights stated in terms of racial equality.²⁰⁰ The statute simply states that removal is available in actions “[a]gainst any person who is denied or cannot enforce in the courts of such State a right under any law providing for the equal civil rights of citizens of the United States, or of all persons within the jurisdiction thereof.”²⁰¹

However egregious its prior interpretations, though, the Court is unlikely to overturn half-century-old precedent and extend the scope of federal jurisdiction when Congress can readily clarify the removal statute itself by amending it. The Court has said that “*stare decisis* in respect to statutory interpretation has ‘special force,’ for ‘Congress remains free to alter what [the Court has] done.’”²⁰² And while a statute affecting federal jurisdiction “must be construed both with precision and with fidelity to the

195. See supra notes 160–166 and accompanying text.

196. See supra notes 134–142 and accompanying text.

197. See supra note 3 (text of the statute); supra section II.C (discussing the Court’s most recent interpretations).

198. 140 S. Ct. 1731 (2020). There, Justice Neil Gorsuch said this of the “unexpected consequences” of the Civil Rights Act of 1964: “Those who adopted the Civil Rights Act might not have anticipated their work would lead to this particular result. . . . But the limits of the drafters’ imagination supply no reason to ignore the law’s demands. . . . Only the written word is the law, and all persons are entitled to its benefit.” *Id.* at 1737.

199. As first announced by the Court in *Virginia v. Rives*, see supra section I.B, and most recently affirmed in *City of Greenwood v. Peacock*, see supra section II.C.

200. As announced by the Court in *Georgia v. Rachel*. See supra section II.C.

201. 28 U.S.C. § 1443(1) (2018).

202. *John R. Sand & Gravel Co. v. United States*, 552 U.S. 130, 139 (2008) (quoting *Patterson v. McLean Credit Union*, 491 U.S. 164, 172–73 (1989)).

terms by which Congress has expressed its wishes,²⁰³ Congress's longstanding silence in the wake of the Court's 1966 decisions—as well as its 1964 decision to reenact appeals rather than actually amend the already-limited statute—will likely caution the Court away from upending its removal precedents.²⁰⁴

Therefore, it is likely up to Congress to restate the scope and requirements of civil rights removal in statutory reform. The provision's broad language can certainly be clarified, and experience suggests that the provision would benefit from more detailed explication in the statute itself.²⁰⁵ Reform by legislative amendment would also clear away the centuries of restrictive precedent that presently limits removal and enable Congress to plainly express the scope of this form of jurisdiction, a suggestion for which is proposed here.

2. *Scope.* — The modernized civil rights removal statute should be broad enough to cover all cases in which defendants raise a colorable defense arising out of their expression of a civil right that is specifically enumerated in the removal statute. In other words, a state civil suit or criminal prosecution brought against a defendant *because* the defendant asserted a covered federal statutory right should constitute a plausible “denial” of that right within the meaning of the removal statute. The federal rights enabling removal should include by reference those rights found in federal laws of egalitarian purpose,²⁰⁶ though it may be preferable—as a matter of controlling the flow of cases from state to federal court—for Congress to articulate the rights enabling removal in the removal statute itself. Under that scenario, a defendant could not justify removal based on a right arising generally from the U.S. Constitution, for example, but instead would have to look to Congress for statutory conferral of removal jurisdiction over cases implicating that right.

203. *Kucana v. Holder*, 558 U.S. 233, 252 (2010) (internal quotation marks omitted) (quoting *Cheng Fan Kwok v. Immigr. & Naturalization Serv.*, 392 U.S. 206, 212 (1968)); see also *New Orleans Pub. Serv., Inc. v. Council of New Orleans*, 491 U.S. 350, 359 (1989) (noting the “undisputed constitutional principle that Congress, and not the Judiciary, defines the scope of federal jurisdiction within the constitutionally permissible bounds”).

204. See *supra* section II.A (discussing the 1964 legislation); *supra* section II.C (discussing the 1966 decisions). The Court said as much in its *Peacock* decision. See *supra* text accompanying note 166.

205. See *supra* section II.B. Congress can take as an example the neighboring federal officer removal statute, which is five times longer and defines relevant terms. See 28 U.S.C. § 1442.

206. E.g., Americans With Disabilities Act of 1990, Pub. L. No. 101-336, 104 Stat. 327; Age Discrimination Act of 1975, Pub. L. No. 94-135, 89 Stat. 728; Title IX of the Education Amendments of 1972, Pub. L. No. 92-318, 86 Stat. 235; Civil Rights Act of 1968, Pub. L. No. 90-284, 82 Stat. 73; Voting Rights Act of 1965, Pub. L. No. 89-110, 79 Stat. 437; Civil Rights Act of 1964, Pub. L. No. 88-352, 78 Stat. 241; see also Equality Act, S. 393, 117th Cong. (2021); Equality Act, H.R. 5, 117th Cong. (2021).

In addition, modern civil rights removal should not be limited to cases involving race-based rights, as is currently the case under the Supreme Court's 1966 interpretation.²⁰⁷ The text of the current statute includes no such restriction; it refers broadly to "any law" providing for equal civil rights.²⁰⁸ The four Justices dissenting from the Court's opinion in *Peacock* emphasized that "the minorities who are the subject of repression are not only those who espouse the cause of racial equality"; their opinion also lists the plight of religious minorities, ethnic minorities, and even labor union organizers as the "setting [in which] removal jurisdiction must be considered."²⁰⁹ The availability of civil rights removal for Black defendants remains essential, especially as facially discriminatory state laws have given way to subtler and perhaps more pervasive means of denying federal civil rights guarantees.²¹⁰ But other prejudices abound, and today many defendants seeking to vindicate federal rights based on sex,²¹¹ sexual

207. See supra notes 153–155 and accompanying text (discussing the *Rachel* Court's narrow reading of the statute).

208. See 28 U.S.C. § 1443; supra note 3 (text of the statute).

209. See *City of Greenwood v. Peacock*, 384 U.S. 808, 839 (1966) (Douglas, J., dissenting); supra note 193.

210. See Kenji Yoshino, *Covering: The Hidden Assault on Our Civil Rights* 21–22 (2006) ("We are at a transitional moment in how Americans discriminate. In the old generation, discrimination targeted entire groups In the new generation, discrimination directs itself not against the entire group, but against the subset of the group that fails to assimilate to mainstream norms."); Kimberlé Williams Crenshaw, *Race, Reform, and Retrenchment: Transformation and Legitimation in Antidiscrimination Law*, 101 *Harv. L. Rev.* 1331, 1379 (1988) ("The end of Jim Crow has been accompanied by the demise of an explicit ideology of white supremacy. The white norm, however, . . . has only been submerged in popular consciousness. It continues in an unspoken form . . . , legitimating the continuing domination of those who do not meet it."); Elizabeth F. Emens, *Intimate Discrimination: The State's Role in the Accidents of Sex and Love*, 122 *Harv. L. Rev.* 1307, 1309 (2009) ("Most . . . decisionmakers . . . no longer say overtly discriminatory things. Discrimination is therefore harder to find and to regulate, because it has become less acceptable, legally and socially, to speak its language. Yet some . . . in our society, such as people of color and disabled people, are still subject to systematic disadvantage.").

211. For example, the Supreme Court's decision in *Dobbs v. Jackson Women's Health Organization*, 142 S. Ct. 2228 (2022), is likely to spur a complicated web of state laws regulating abortion. See David S. Cohen, Greer Donley & Rachel Rebouché, *The New Abortion Battleground*, 123 *Colum. L. Rev.* 1, 22, 30–34 (2023) (discussing jurisdictional issues that arise from conflicting extraterritorial antiabortion laws). It is also likely that those bills will in certain circumstances conflict with current and future federal statutory sex-based rights, enabling removal under a modernized civil rights removal statute when access to a federal forum would not otherwise be possible. See *id.* at 52–53 ("Interstate issues are not the only area that will cause deep confusion: Interaction between federal and state law will also be complicated and in flux.").

orientation,²¹² and gender identity,²¹³ for example, may anticipate different treatment depending on the forum in which litigation against

212. Certain state courts are statistically less supportive of LGBTQ rights. See Eric Lesh, Lambda Legal, Justice Out of Balance: How the Election of Judges and the Stunning Lack of Diversity on State Courts Threaten LGBT Rights 22 (2016), https://legacy.lambdalegal.org/sites/default/files/publications/downloads/justiceoutofbalance_final_rev1_2.pdf [<https://perma.cc/PC4F-EZXQ>] (finding through data from state judiciaries that “[s]tate high courts whose judges stand for election are less supportive of LGBT rights claims” than those whose judges receive lifetime tenure). Thus, LGBTQ defendants in state courts with elected judges would benefit from the choice whether to proceed in federal court, thereby more likely avoiding “implicit bias, ideological factors and outside influences [that] seep into the courtroom[] [and] taint[] the judicial decision-making process.” *Id.* at 3.

Civil rights removal would also provide seemingly the only opportunity for defendants targeted by the recent rise of anti-LGBTQ state legislation to shift cases against them to a federal forum. See, e.g., Priya Krishnakumar & Devan Cole, 2022 Is Already a Record Year for State Bills Seeking to Curtail LGBTQ Rights, ACLU Data Shows, CNN (July 17, 2022), <https://www.cnn.com/2022/07/17/politics/state-legislation-lgbtq-rights/> [<https://perma.cc/3HK9-9T6Z>]. For instance, more than a dozen states have proposed or enacted “Don’t Say Gay” legislation targeting the discussion of sexual orientation and gender identity in schools. See Dustin Jones & Jonathan Franklin, Not Just Florida. More Than a Dozen States Propose So-Called ‘Don’t Say Gay’ Bills, NPR (Apr. 10, 2022), <https://www.npr.org/2022/04/10/1091543359/15-states-dont-say-gay-anti-transgender-bills> [<https://perma.cc/72N7-5F32>]. Florida’s version, enacted in July 2022, creates a private right of action empowering any parent to seek declaratory and injunctive relief and receive damages awards from school districts that violate the law. See 2022 Fla. Laws 22 (codified as amended at Fla. Stat. Ann. § 1001.42(8)(c)(7)(b)(II) (West 2023)). Due in part to its vagueness and resulting broad potential for legal action, the law has already had a notable chilling effect on Florida educators. See Sarah Mervosh, Back to School in DeSantis’s Florida, as Teachers Look Over Their Shoulders, N.Y. Times (Aug. 27, 2022), <https://www.nytimes.com/2022/08/27/us/desantis-schools-dont-say-gay.html> (on file with the *Columbia Law Review*); Jo Yurcaba, Florida Teachers Navigate Their First Year Under the ‘Don’t Say Gay’ Law, NBC News (Aug. 19, 2022), <https://www.nbcnews.com/nbc-out/florida-teachers-navigate-first-year-dont-say-gay-law-rcna43817> [<https://perma.cc/H6W7-HY72>]. Assuming that any action brought against these educators involves only state claims, they would have no choice but to proceed in Florida state courts. For an argument that these types of laws violate the U.S. Constitution, see Clifford Rosky, Anti-Gay Curriculum Laws, 117 Colum. L. Rev. 1461, 1517–34 (2017).

This does not mean that federal courts are generally preferable for LGBTQ parties. See, e.g., William B. Rubenstein, The Myth of Superiority, 16 Const. Comment. 599, 599 (1999) (showing that “gay litigants seeking to establish and vindicate civil rights have generally fared better in state courts than they have in federal courts”); Strict Scrutiny, Queer Supremacy (A Pride Special), Crooked Media, at 45:09–48:58 (June 16, 2022), <https://crooked.com/podcast/queer-supremacy/> (on file with the *Columbia Law Review*) (ACLU attorney Chase Strangio discussing the decision to challenge Texas’s antitrans actions in state court due to expected unfavorable treatment in the Fifth Circuit). Many factors affect the extent of bias among members of the judiciary, and modern civil rights removal would enable the litigants most likely to be affected by that bias to choose the forum in which to proceed.

213. The implications of state-court prejudice based on sexual orientation and the rise of “Don’t Say Gay” laws, see *supra* note 212, apply with even more force to gender identity. Other recent state legislation specifically target transgender youth. See, e.g., Devan Cole, Arizona Governor Signs Bill Outlawing Gender-Affirming Care for Transgender Youth and Approves Anti-Trans Sports Ban, CNN (Mar. 30, 2022), <https://www.cnn.com/2022/>

them proceeds.²¹⁴ When the potential for such disparate treatment exists—notwithstanding whether there is actual evidence of discrimination—Congress has sought to shift the balance in forum choice. And when the general removal statute fails to capture the full range of eligible cases, civil rights removal fills the gap.

This approach eliminates the federal court’s consideration of state prejudice on motions to remand, limiting the post-removal finding required of the federal judge to the question whether the defendant has plausibly shown that their actions giving rise to the case were protected by a federal civil right. It also vindicates removal’s basic purpose as an initial forum-setting tool rather than a trial-within-a-trial delay mechanism. Congress has determined that prejudice against defendants raising federal civil rights defenses is possible, and it extended removal as a check against that risk; the federal court’s role upon receiving such cases generally is to proceed with them, not to conduct lengthy investigations of the circumstances leading to their removal. In addition, enabling removal based on only specific federal statutory rights (and not constitutional rights standing alone) enables lower courts to construe the statute with fidelity to Congress’s intended scope of removal jurisdiction; Congress can pass laws affirming specific constitutional rights in statutory form as needed, avoiding a blanket extension of federal jurisdiction over any case in which a defendant can plausibly raise a constitutional defense.

03/30/politics/arizona-transgender-health-care-ban-sports-ban/index.html [https://perma.cc/C49D-TS5W]; Dean Mirshahi, Gov. Youngkin Unveils Administration’s Plan to Replace Virginia’s Transgender Student Policies, ABC 8News (Sept. 16, 2022), https://www.wric.com/news/virginia-news/gov-youngkin-unveils-administrations-plan-to-replace-virginias-model-transgender-policies/ [https://perma.cc/KNN7-2BGG] (detailing proposed guidelines requiring transgender students to use school bathrooms that align with the sex they were assigned at birth). Some state laws targeting transgender students may violate Title IX. See, e.g., *Grimm v. Gloucester Cnty. Sch. Bd.*, 972 F.3d 586, 593, 619 (4th Cir. 2020) (holding that a policy requiring students to use bathrooms based on their biological sex unlawfully discriminated against transgender students in violation of Title IX).

In a 2021 case involving the firing of a schoolteacher due to their treatment of a transgender student, the Fourth Circuit reviewed a school board’s removal of a suit to federal court under 28 U.S.C. § 1443 based on the board’s Title IX defense. See *Vlaming v. W. Point Sch. Bd.*, 10 F.4th 300, 303 (4th Cir. 2021). The court rejected the removal due to the Supreme Court’s restrictive interpretations of the statute, saying it did not endorse the Court’s view of the statute but was “bound to apply it.” *Id.* at 311.

214. The statute would not be limited to those examples. The forum-setting purpose of civil rights removal is adequately supported only by a statute that enables removal in the countless overlooked situations in which people unpopular in their community seek to vindicate their federal rights.

Several scholars have posited their own visions of civil rights removal, some too narrow²¹⁵ and some too broad²¹⁶ to successfully avoid the pitfalls that have plagued the removal statute throughout its history. This Note's framework is similar to that imposed on defendants seeking removal under the federal officer removal statute, an analogous congressional extension of removal jurisdiction over cases potentially implicating national concerns.²¹⁷ The Supreme Court has repeatedly emphasized how that provision is to be "liberally construed to give full effect to the purposes for which [it was] enacted."²¹⁸ It has also rejected the notion that removal of federal officer cases should be sustained "only when the officers had a *clearly sustainable* defense," stressing that removal's very purpose "is to have the validity of the defense . . . tried in a federal court."²¹⁹ For both federal officer and civil rights removal, then, nothing more than plausibility should be required to survive a motion to remand.

3. *Consequences.* — A significant consequence of the expansion of civil rights removal would be the disruption of the federal–state jurisdictional balance, especially in criminal actions. After all, a statute even moderately broader than the currently restricted version would enable removal for far

215. Professor Martin Redish suggests that the removal provision should be interpreted to authorize removal when "established state judicial practices and procedures violate a federal civil right of equality" or when "state procedures are so defective or the applicable state precedents so in conflict with federal law that the defendant will be unable adequately to vindicate his applicable federal substantive rights in the state judicial system." Martin H. Redish, *Revitalizing Civil Rights Removal Jurisdiction*, 64 *Minn. L. Rev.* 523, 525 (1980) [hereinafter Redish, *Revitalizing Civil Rights Removal*] (footnote omitted). This approach would require a rigorous postremoval inquiry by the federal court, one perhaps even more expansive than the proceedings in removal cases during the Civil Rights Movement. See Amsterdam, *Federal Removal*, *supra* note 13, at 858 (explaining why "this sort of inquiry is inconvenient and judicially embarrassing in the extreme"); *supra* section II.B.

216. Professor Amsterdam argues that removal should be made available on "a colorable showing that the conduct for which [the defendant] is prosecuted was conduct protected by the federal constitutional guarantees of civil rights." See Amsterdam, *Federal Removal*, *supra* note 13, at 804, 861–74. But enabling removal based on general federal constitutional defenses risks extending the scope of civil rights removal jurisdiction far beyond what Congress would likely intend. The *Peacock* Court's fear of an overwhelmed federal judiciary tasked with handling countless cases that plausibly allege the denial of some federal constitutional right, see *supra* note 165 and accompanying text, becomes more realistic. Remand decisions would be inconsistent between judges and across forums, and statutory expressions of federal rights would do little to clarify a jurisdictional scope that includes all rights originating from the Constitution.

217. See 28 U.S.C. § 1442 (2018); *Mesa v. California*, 489 U.S. 121, 133–34 (1989) (concluding that § 1442(a)(1) encompasses cases in which federal officers raise a colorable defense arising out of their duty to enforce federal law); *Willingham v. Morgan*, 395 U.S. 402, 406–07 (1969) (stating that the right of removal under § 1442(a)(1) is absolute when a suit in state court is for any act "under color" of federal office); *supra* note 187 (text of the federal officer removal statute).

218. *Colorado v. Symes*, 286 U.S. 510, 517 (1932); see also, e.g., *Watson v. Philip Morris Cos.*, 551 U.S. 142, 147 (2007); *Willingham*, 395 U.S. at 406.

219. *Willingham*, 395 U.S. at 407 (emphasis added).

more people than does the federal officer removal statute. Determining the extent of that disruption requires further research and may be difficult to do in advance given declining explicit prejudice among members of the state and federal judiciaries and the variety of factors that would influence a contemporary civil rights defendant's choice whether to remove from or remain in a state forum.²²⁰ But the very possibility of defendants shifting state criminal cases to federal court would represent a significant change in states' traditionally unfettered authority over the administration of their criminal law.²²¹ And removal is a particularly salient form of intrusion in that it has typically halted the state's proceeding and begun a new one expected to proceed thereafter in the federal courts.²²²

220. See supra notes 190–194, 210–214, and accompanying text. At the very least, it is probably safe to predict that the volume of cases removed under a modernized statute would pale in comparison to the waves of removals amid the South's express, unified defiance of federal civil rights law in the 1960s. See Amsterdam, Federal Removal, supra note 13, at 838 (“[M]ost civil rights lawyers would take as many prosecutions as possible out of the southern state courts . . . [I]f their actions restore confidence in the adequacy of state process, a balance will probably be struck at what is in fact, as well as theory, concurrent state and federal trial jurisdiction.”); supra section II.B. For an argument that the inability to calculate state–federal parity should lead to a deemphasis on considerations of the role of parity in defining the role of federal courts, see Erwin Chemerinsky, Parity Reconsidered: Defining a Role for the Federal Judiciary, 36 UCLA L. Rev. 233, 255–80 (1988).

221. Justifications for state sovereignty over criminal matters include, among others, assigning primary responsibility for controlling society through law by preventing interference with law enforcement processes, see David A. Dittfurth, The *Younger* Abstention Doctrine: Primary State Jurisdiction Over Law Enforcement, 10 St. Mary's L.J. 445, 481 (1979); the avoidance of federal constitutional issues that can be decided on state-law grounds, see Amsterdam, Federal Removal, supra note 13, at 830; and that “leaving federal defensive issues to the state criminal courts in the first instance gives those courts a promising opportunity for partnership in the administration of federal law,” see *id.*

The equitable abstention doctrine born from *Younger v. Harris*, 401 U.S. 37 (1971), for example, prevents federal trial courts from interfering with ongoing state criminal proceedings except in extraordinary circumstances, even on a defendant's “showing the likelihood that the state law underlying that proceeding is in violation of the United States Constitution,” see Dittfurth, supra, at 445. Of course, Congress, the definer of federal jurisdiction, see supra note 12, could narrow that doctrine by declaring circumstances justifying civil rights removal as sufficiently extraordinary to warrant federal intervention. Justice Marshall made a similar plea in his dissenting opinion in *Johnson v. Mississippi*, arguing that the Court's decision in *Younger* should not lead the federal courts to adhere strictly to the state–federal balance at all times. See *Johnson v. Mississippi*, 421 U.S. 213, 239 (1975) (Marshall, J., dissenting) (“I only hope that the recent instances in which this Court has emphasized the values of comity and federalism . . . will not mislead the district courts into forgetting that at times these values must give way to the need to protect federal rights from being irremediably trampled.”); supra notes 168–173 and accompanying text.

222. See Redish, Revitalizing Civil Rights Removal, supra note 215, at 548. For an acknowledgment of this issue and a solution that encourages Congress to express the scope of civil rights removal with absolute clarity, see Amsterdam, Federal Removal, supra note 13, at 831–32, 838.

Congress adjusted this aspect of removal procedure in 2011; now “[t]he filing of a notice of removal of a criminal prosecution shall not prevent the State court in which such prosecution is pending from proceeding further, except that a judgment of conviction shall

The Reconstruction Congress arguably understood the consequences of such a shift when it enacted the originally unrestrained civil rights removal provision,²²³ designed then to open the federal courts to defendants who would otherwise almost surely face the explicit denial of their rights in state court systems. Though that form of systematic prejudice is mostly extinguished today and enduring subtler prejudices are more dispersed throughout the country and between the state and federal judiciary,²²⁴ it is not inconceivable that today's Congress could similarly conclude that in certain circumstances the protection of individual rights—especially in contemporary situations when the disregard of those rights may take place but is likely to go undetected—is worth sacrificing absolute parity in the state–federal balance.

This Note argues that Congress should conclude as much,²²⁵ but it recognizes that such a judgment would come with costs—primarily involving resource constraints—that are more fully explored in other scholarship.²²⁶ At the very least, it is important to acknowledge that the resource constraints imposed on the federal judiciary are themselves policy choices; it may make sense, then, for Congress to accompany an expansion of removal jurisdiction with expansion of the federal bench²²⁷ or with the elimination or reduction of diversity jurisdiction.²²⁸ But even

not be entered unless the prosecution is first remanded.” Federal Courts Jurisdiction and Venue Clarification Act of 2011, Pub. L. No. 112-63, sec. 103(c), 125 Stat. 758, 761 (codified at 28 U.S.C. § 1455(b)(3)). A revised civil rights removal statute would likely also require revising this provision since continuation of the state court proceeding would largely defeat the purposes served by Congress's grant of civil rights removal jurisdiction.

223. See Kutler, *supra* note 15, at 143–60 (“In a variety of ways, . . . the federal system was given authority to assume a more dominant position over the state courts. . . . While Congress seldom verbalized its broader aims, the cumulative effect of its [removal] legislation was a tremendous alteration of federal power.”); see also Amsterdam, *Federal Removal*, *supra* note 13, at 829–30 (“Ample extension of such protective jurisdiction was the critical concern of the Reconstruction Congresses. In matters of civil rights, it was their considered resolution of the federal problem.”); Redish, *Revitalizing Civil Rights Removal*, *supra* note 215, at 548 (“By explicitly calling for pretrial removal, the civil rights removal statute represents a congressional determination that those denied specified civil rights in state court need not suffer the physical, financial, and emotional expense of a state trial.”).

224. See *supra* notes 190–194, 210–214, and accompanying text.

225. See *supra* section III.A.

226. See, e.g., Amsterdam, *Federal Removal*, *supra* note 13, at 830–42; Paul M. Bator, *The State Courts and Federal Constitutional Litigation*, 22 *Wm. & Mary L. Rev.* 605, 611–12 (1981); Redish, *Revitalizing Civil Rights Removal*, *supra* note 215, at 548–53.

227. See Fallon et al., *supra* note 24, at 42–43 (noting that “the federal district courts are seriously overtaxed by their current caseloads” and that “[o]ne obvious response . . . would be to increase substantially the number of federal judges”).

228. See *id.* (“The leading studies have all recommended substantial curtailments in the diversity jurisdiction”); Friendly, *supra* note 35, at 3–4, 139–52 (“Justice Frankfurter said that ‘[a]n Act for the elimination of diversity jurisdiction could fairly be called an Act for the relief of the federal courts.’ . . . [T]he time for such relief has come.” (alteration in original) (quoting *Nat'l Mut. Ins. v. Tidewater Transfer Co.*, 337 U.S. 582, 651 (1949) (Frankfurter, J., dissenting))); Larry Kramer, *Diversity Jurisdiction*, 1990 *BYU L. Rev.* 97,

were Congress not willing to accept the broad scope of modern civil rights removal suggested here,²²⁹ it should still investigate which defendants are most likely to be impacted by implicit biases and subtle prejudices during judicial proceedings and ensure that they are adequately supported by procedural tools such as the forum-setting choice enabled by removal. Removal has long been widely available to corporations and other well-resourced parties under existing removal statutes,²³⁰ and it is long past time to ensure that the nation's most vulnerable parties are adequately equipped with this tool as well.

CONCLUSION

Civil rights removal represents Congress's recognition that, in certain instances, state courts (and the Supreme Court on discretionary review) are not sufficiently equipped to guarantee federal rights. The removal statute has a long, complicated history, and unlocking its defendant-empowering potential for a third time in our federal experiment would surely involve new challenges not present in the nineteenth or twentieth centuries. But our nation remains beset with dangerous prejudices, including many not surfaced in those times, and those ostracized within today's legal regime deserve every chance at securing a just outcome based on rights guaranteed to all.²³¹ Removal, by its provision of forum choice, can help provide that chance, as it once briefly did for thousands of defendants caught up in the American justice system.

102–07; Thomas D. Rowe, Jr., *Abolishing Diversity Jurisdiction: Positive Side Effects and Potential for Further Reforms*, 92 *Harv. L. Rev.* 963, 969–81 (1979). But see Scott DeVito, *Of Bias and Exclusion: An Empirical Study of Diversity Jurisdiction, Its Amount-in-Controversy Requirement, and Black Alienation From U.S. Civil Courts*, 13 *Geo. J.L. & Mod. Critical Race Persps.* 1, 7 (2021) (arguing that raising the amount-in-controversy requirement “reinforces, entrenches, and expands Black alienation from the U.S. justice system by making it harder for those Black claimants willing to trust the system to file in the federal courts”).

229. See *supra* section III.B.2.

230. See Edward A. Purcell, Jr., *Litigation and Inequality: Federal Diversity Jurisdiction in Industrial America, 1870–1958*, at 20–22 (1992) (collecting statistical data about corporate removal during the late nineteenth and early twentieth centuries); Neal Miller, *An Empirical Study of Forum Choices in Removal Cases Under Diversity and Federal Question Jurisdiction*, 41 *Am. U. L. Rev.* 369, 391 (1992) (noting in a study that “corporations constituted 62% of the defendants” in removal cases during fiscal year 1987).

231. Professor Amsterdam, champion of civil rights removal when it was needed most, said this about the enduring need for a check against state power:

In time, from locality to locality, these organs may unlearn old prejudices, but predictably they will learn new ones. In time they may unlearn some of the fear and ignorance and interest which underlie all prejudices; but federal guarantees predictably will also develop with time, and insofar as they are needed those guarantees will always represent the gap between the evolving ideal of freedom and the capacity of the representatives of power to let men be free.

Amsterdam, *Federal Removal*, *supra* note 13, at 801–02 (footnote omitted).

APPENDIX A:
CRIMINAL CASES REMOVED FROM MISSISSIPPI STATE COURTS, 1961–1969

<i>Removed</i>	<i>Case Name</i>	<i>Docket No.</i>	<i>District</i>	<i>Division</i>
8/11/1961	Mississippi v. Brown	3196	S.D. Miss.	Jackson
8/11/1961	Mississippi v. Carey	3197	S.D. Miss.	Jackson
8/11/1961	Mississippi v. Frieze	3198	S.D. Miss.	Jackson
8/11/1961	Mississippi v. Luster	3199	S.D. Miss.	Jackson
8/11/1961	Mississippi v. Smith	3200	S.D. Miss.	Jackson
12/18/1962	Mississippi v. Crawford	3319	S.D. Miss.	Jackson
10/21/1963	City of Jackson v. Poole	3393	S.D. Miss.	Jackson
11/18/1963	City of Jackson v. Trapp	3405	S.D. Miss.	Jackson
4/3/1964	City of Greenwood v. Peacock	GCR6414	N.D. Miss.	Greenville
4/13/1964	City of Jackson v. Collins	3433	S.D. Miss.	Jackson
6/11/1964	Mississippi v. Austin	3437	S.D. Miss.	Jackson
6/11/1964	Mississippi v. Bennett	3438	S.D. Miss.	Jackson
6/11/1964	Mississippi v. Bennett	3439	S.D. Miss.	Jackson
6/11/1964	Mississippi v. Body	3440	S.D. Miss.	Jackson
6/11/1964	Mississippi v. Brown	3441	S.D. Miss.	Jackson
6/11/1964	Mississippi v. Brown	3442	S.D. Miss.	Jackson
6/11/1964	Mississippi v. Buckley	3443	S.D. Miss.	Jackson
6/11/1964	Mississippi v. Clay	3444	S.D. Miss.	Jackson
6/11/1964	Mississippi v. Davis	3445	S.D. Miss.	Jackson
6/11/1964	Mississippi v. Dawson	3446	S.D. Miss.	Jackson
6/11/1964	Mississippi v. Dawson	3447	S.D. Miss.	Jackson
6/11/1964	Mississippi v. Drain	3448	S.D. Miss.	Jackson
6/11/1964	Mississippi v. Drain	3449	S.D. Miss.	Jackson
6/11/1964	Mississippi v. Evans	3450	S.D. Miss.	Jackson
6/11/1964	Mississippi v. George	3451	S.D. Miss.	Jackson
6/11/1964	Mississippi v. Grant	3452	S.D. Miss.	Jackson
6/11/1964	Mississippi v. Gray	3453	S.D. Miss.	Jackson
6/11/1964	Mississippi v. Hamblin	3454	S.D. Miss.	Jackson
6/11/1964	Mississippi v. Hollis	3455	S.D. Miss.	Jackson
6/11/1964	Mississippi v. Johnson	3456	S.D. Miss.	Jackson
6/11/1964	Mississippi v. Jones	3457	S.D. Miss.	Jackson
6/11/1964	Mississippi v. Levy	3458	S.D. Miss.	Jackson
6/11/1964	Mississippi v. Lockett	3459	S.D. Miss.	Jackson
6/11/1964	Mississippi v. Lockett	3460	S.D. Miss.	Jackson
6/11/1964	Mississippi v. McCullough	3461	S.D. Miss.	Jackson
6/11/1964	Mississippi v. Melton	3462	S.D. Miss.	Jackson
6/11/1964	Mississippi v. Nicholls	3463	S.D. Miss.	Jackson
6/11/1964	Mississippi v. Owens	3464	S.D. Miss.	Jackson
6/11/1964	Mississippi v. Small	3465	S.D. Miss.	Jackson

<i>Removed</i>	<i>Case Name</i>	<i>Docket No.</i>	<i>District</i>	<i>Division</i>
6/11/1964	Mississippi v. Shell	3466	S.D. Miss.	Jackson
6/11/1964	Mississippi v. Small	3467	S.D. Miss.	Jackson
6/11/1964	Mississippi v. Thomas	3468	S.D. Miss.	Jackson
6/11/1964	Mississippi v. Walker	3469	S.D. Miss.	Jackson
6/11/1964	Mississippi v. Washington	3470	S.D. Miss.	Jackson
6/11/1964	Mississippi v. Washington	3471	S.D. Miss.	Jackson
6/11/1964	Mississippi v. Washington	3472	S.D. Miss.	Jackson
6/11/1964	Mississippi v. Hewitt	3473	S.D. Miss.	Jackson
6/11/1964	Mississippi v. Smith	3474	S.D. Miss.	Jackson
6/11/1964	Mississippi v. Weaver	3475	S.D. Miss.	Jackson
6/11/1964	Mississippi v. Watts	3476	S.D. Miss.	Jackson
6/11/1964	Mississippi v. Watts	3477	S.D. Miss.	Jackson
6/11/1964	Mississippi v. Palmer	3478	S.D. Miss.	Jackson
6/11/1964	Mississippi v. Palmer	3479	S.D. Miss.	Jackson
6/11/1964	Mississippi v. Myers	3480	S.D. Miss.	Jackson
6/11/1964	Mississippi v. Myers	3481	S.D. Miss.	Jackson
6/11/1964	Mississippi v. Chinn	3482	S.D. Miss.	Jackson
6/11/1964	Mississippi v. Bosley	3483	S.D. Miss.	Jackson
6/11/1964	Mississippi v. Bosley	3484	S.D. Miss.	Jackson
6/11/1964	Mississippi v. Bosley	3485	S.D. Miss.	Jackson
6/11/1964	Mississippi v. Hollander	3486	S.D. Miss.	Jackson
6/11/1964	Mississippi v. Jones	3487	S.D. Miss.	Jackson
6/11/1964	Mississippi v. Jones	3488	S.D. Miss.	Jackson
6/11/1964	Mississippi v. Jewett	3489	S.D. Miss.	Jackson
6/11/1964	Mississippi v. Jewett	3490	S.D. Miss.	Jackson
6/11/1964	Mississippi v. Brown	3491	S.D. Miss.	Jackson
6/11/1964	Mississippi v. McMurty	3492	S.D. Miss.	Jackson
6/11/1964	Mississippi v. Escoe	3493	S.D. Miss.	Jackson
6/11/1964	Mississippi v. Hamblin	3494	S.D. Miss.	Jackson
6/11/1964	Mississippi v. Hollander	3495	S.D. Miss.	Jackson
6/11/1964	Mississippi v. Johnson	3496	S.D. Miss.	Jackson
6/12/1964	Mississippi v. Veal	3497	S.D. Miss.	Jackson
6/12/1964	Mississippi v. Veal	3498	S.D. Miss.	Jackson
6/12/1964	Mississippi v. Mory	3499	S.D. Miss.	Jackson
6/12/1964	Mississippi v. Cole	3500	S.D. Miss.	Jackson
6/12/1964	Mississippi v. Alexander	3501	S.D. Miss.	Jackson
6/12/1964	Mississippi v. Hamblin	3502	S.D. Miss.	Jackson
6/12/1964	Mississippi v. Hamblin	3503	S.D. Miss.	Jackson
6/12/1964	Mississippi v. Merritt	3504	S.D. Miss.	Jackson
6/12/1964	Mississippi v. Chinn	3505	S.D. Miss.	Jackson
6/12/1964	Mississippi v. Merritt	3506	S.D. Miss.	Jackson
6/12/1964	Mississippi v. Blackman	3507	S.D. Miss.	Jackson

<i>Removed</i>	<i>Case Name</i>	<i>Docket No.</i>	<i>District</i>	<i>Division</i>
6/12/1964	Mississippi v. Brown	3508	S.D. Miss.	Jackson
6/12/1964	Mississippi v. Bartee	3509	S.D. Miss.	Jackson
6/12/1964	Mississippi v. Hosman	3510	S.D. Miss.	Jackson
6/16/1964	City of Meridian v. Brown	5151	S.D. Miss.	Meridian
6/16/1964	City of Meridian v. Harris	5152	S.D. Miss.	Meridian
6/16/1964	City of Meridian v. Hosley	5153	S.D. Miss.	Meridian
6/16/1964	City of Meridian v. Johnson	5154	S.D. Miss.	Meridian
6/16/1964	City of Meridian v. Jones	5155	S.D. Miss.	Meridian
6/16/1964	City of Meridian v. Packer	5156	S.D. Miss.	Meridian
6/16/1964	City of Meridian v. Smith	5157	S.D. Miss.	Meridian
6/16/1964	City of Meridian v. Waterhouse	5158	S.D. Miss.	Meridian
6/16/1964	City of Meridian v. Watson	5159	S.D. Miss.	Meridian
6/16/1964	City of Meridian v. Jones	5160	S.D. Miss.	Meridian
6/22/1964	Mississippi v. Crawford	3511	S.D. Miss.	Jackson
6/22/1964	Mississippi v. Mitchell	3512	S.D. Miss.	Jackson
6/22/1964	Mississippi v. Mitchell	3513	S.D. Miss.	Jackson
6/22/1964	Mississippi v. Poole	3514	S.D. Miss.	Jackson
6/22/1964	Mississippi v. Salter	3515	S.D. Miss.	Jackson
6/22/1964	Mississippi v. Salter	3516	S.D. Miss.	Jackson
6/22/1964	Mississippi v. Bracey	3517	S.D. Miss.	Jackson
6/22/1964	Mississippi v. Ladner	3518	S.D. Miss.	Jackson
6/22/1964	Mississippi v. Adams	3519	S.D. Miss.	Jackson
6/22/1964	Mississippi v. Armstrong	3520	S.D. Miss.	Jackson
6/22/1964	Mississippi v. Dickey	3521	S.D. Miss.	Jackson
6/22/1964	Mississippi v. Moore	3522	S.D. Miss.	Jackson
6/26/1964	Mississippi v. Hartfield	1305	S.D. Miss.	Hattiesburg
6/26/1964	Mississippi v. Everett	1306	S.D. Miss.	Hattiesburg
6/26/1964	Mississippi v. Bergstresser	1307	S.D. Miss.	Hattiesburg
6/26/1964	Mississippi v. Watters	1308	S.D. Miss.	Hattiesburg
6/26/1964	Mississippi v. Dohrenburg	1309	S.D. Miss.	Hattiesburg
6/26/1964	Mississippi v. Alexander	1310	S.D. Miss.	Hattiesburg
6/26/1964	Mississippi v. Brown	WCR6417	N.D. Miss.	Oxford
6/29/1964	Mississippi v. Brown	ECR6432	N.D. Miss.	Aberdeen
6/30/1964	City of Columbus v. Galloway	ECR6433	N.D. Miss.	Aberdeen
7/6/1964	Mississippi v. Anderson	1311	S.D. Miss.	Hattiesburg
7/6/1964	Mississippi v. Bailey	1312	S.D. Miss.	Hattiesburg
7/6/1964	Mississippi v. Brown	1313	S.D. Miss.	Hattiesburg
7/6/1964	Mississippi v. Cameron	1314	S.D. Miss.	Hattiesburg
7/6/1964	Mississippi v. Campbell	1315	S.D. Miss.	Hattiesburg
7/6/1964	Mississippi v. Conner	1316	S.D. Miss.	Hattiesburg
7/6/1964	Mississippi v. Crosby	1317	S.D. Miss.	Hattiesburg
7/6/1964	Mississippi v. Dantzler	1318	S.D. Miss.	Hattiesburg

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7/6/1964	Mississippi v. Froom	1319	S.D. Miss.	Hattiesburg
7/6/1964	Mississippi v. Hall	1320	S.D. Miss.	Hattiesburg
7/6/1964	Mississippi v. King	1321	S.D. Miss.	Hattiesburg
7/6/1964	Mississippi v. Lawrence	1322	S.D. Miss.	Hattiesburg
7/6/1964	Mississippi v. Mehl	1323	S.D. Miss.	Hattiesburg
7/6/1964	Mississippi v. Murphy	1324	S.D. Miss.	Hattiesburg
7/6/1964	Mississippi v. Parker	1325	S.D. Miss.	Hattiesburg
7/6/1964	Mississippi v. Patton	1326	S.D. Miss.	Hattiesburg
7/6/1964	Mississippi v. Plump	1327	S.D. Miss.	Hattiesburg
7/6/1964	Mississippi v. Robinson	1328	S.D. Miss.	Hattiesburg
7/6/1964	Mississippi v. Simms	1329	S.D. Miss.	Hattiesburg
7/6/1964	Mississippi v. Stokes	1330	S.D. Miss.	Hattiesburg
7/6/1964	Mississippi v. Sullivan	1331	S.D. Miss.	Hattiesburg
7/6/1964	Mississippi v. Vanderveen	1332	S.D. Miss.	Hattiesburg
7/6/1964	Mississippi v. Vaux	1333	S.D. Miss.	Hattiesburg
7/6/1964	City of Jackson v. Lapsy	3525	S.D. Miss.	Jackson
7/6/1964	City of Jackson v. Lewis	3526	S.D. Miss.	Jackson
7/6/1964	City of Jackson v. Lewis	3527	S.D. Miss.	Jackson
7/6/1964	City of Jackson v. Kerk	3528	S.D. Miss.	Jackson
7/6/1964	City of Jackson v. Lee	3529	S.D. Miss.	Jackson
7/6/1964	City of Jackson v. Lee	3530	S.D. Miss.	Jackson
7/6/1964	Mississippi v. King	3531	S.D. Miss.	Jackson
7/6/1964	Mississippi v. Knight	3532	S.D. Miss.	Jackson
7/6/1964	Mississippi v. Jones	3533	S.D. Miss.	Jackson
7/9/1964	Mississippi v. Glushakow	ECR6434	N.D. Miss.	Aberdeen
7/10/1964	Mississippi v. Cameron	1334	S.D. Miss.	Hattiesburg
7/10/1964	Mississippi v. Jackson	1335	S.D. Miss.	Hattiesburg
7/10/1964	Mississippi v. Maxie	1336	S.D. Miss.	Hattiesburg
7/10/1964	Mississippi v. Walker	1337	S.D. Miss.	Hattiesburg
7/10/1964	Mississippi v. Walker	1338	S.D. Miss.	Hattiesburg
7/10/1964	Mississippi v. Wall	1339	S.D. Miss.	Hattiesburg
7/10/1964	Mississippi v. Wallace	1340	S.D. Miss.	Hattiesburg
7/10/1964	Mississippi v. Williams	1341	S.D. Miss.	Hattiesburg
7/13/1964	Mississippi v. Hancock	1342	S.D. Miss.	Hattiesburg
7/13/1964	City of Jackson v. Haynes	3534	S.D. Miss.	Jackson
7/13/1964	City of Jackson v. Hamilton	3535	S.D. Miss.	Jackson
7/13/1964	City of Jackson v. Hartfield	3536	S.D. Miss.	Jackson
7/13/1964	Mississippi v. Hartfield	3537	S.D. Miss.	Jackson
7/13/1964	City of Jackson v. Henry	3538	S.D. Miss.	Jackson
7/13/1964	City of Jackson v. Henry	3539	S.D. Miss.	Jackson
7/13/1964	City of Jackson v. Henry	3540	S.D. Miss.	Jackson
7/14/1964	City of Meridian v. Allen	5168	S.D. Miss.	Meridian

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7/14/1964	City of Meridian v. Ray	5169	S.D. Miss.	Meridian
7/14/1964	City of Meridian v. Knighton	5170	S.D. Miss.	Meridian
7/14/1964	City of Meridian v. Chandler	5171	S.D. Miss.	Meridian
7/14/1964	City of Meridian v. Calhoun	5172	S.D. Miss.	Meridian
7/14/1964	City of Meridian v. Brown	5173	S.D. Miss.	Meridian
7/14/1964	City of Meridian v. Crowell	5174	S.D. Miss.	Meridian
7/14/1964	City of Meridian v. Smith	5175	S.D. Miss.	Meridian
7/14/1964	City of Meridian v. Smith	5176	S.D. Miss.	Meridian
7/14/1964	City of Meridian v. Brown	5177	S.D. Miss.	Meridian
7/14/1964	City of Meridian v. Smith	5178	S.D. Miss.	Meridian
7/14/1964	City of Meridian v. Thomas	5179	S.D. Miss.	Meridian
7/14/1964	City of Meridian v. Watson	5180	S.D. Miss.	Meridian
7/14/1964	City of Meridian v. Brewer	5181	S.D. Miss.	Meridian
7/14/1964	City of Meridian v. Bell	5182	S.D. Miss.	Meridian
7/14/1964	City of Meridian v. Brown	5183	S.D. Miss.	Meridian
7/14/1964	City of Meridian v. Brown	5184	S.D. Miss.	Meridian
7/14/1964	City of Meridian v. Henderson	5185	S.D. Miss.	Meridian
7/14/1964	City of Meridian v. Heidelberg	5186	S.D. Miss.	Meridian
7/14/1964	City of Meridian v. Flowers	5187	S.D. Miss.	Meridian
7/14/1964	City of Meridian v. Rembert	5188	S.D. Miss.	Meridian
7/14/1964	City of Meridian v. Johnson	5189	S.D. Miss.	Meridian
7/14/1964	City of Meridian v. Jones	5190	S.D. Miss.	Meridian
7/14/1964	City of Meridian v. Naylor	5191	S.D. Miss.	Meridian
7/14/1964	City of Meridian v. Rembert	5192	S.D. Miss.	Meridian
7/14/1964	Mississippi v. Miller	8353	S.D. Miss.	Biloxi
7/14/1964	Mississippi v. Goldstein	8354	S.D. Miss.	Biloxi
7/14/1964	Mississippi v. Cleverdon	8355	S.D. Miss.	Biloxi
7/15/1964	City of Clarksdale v. Carmichael	DCR6427	N.D. Miss.	Clarksdale
7/15/1964	Mississippi v. Rayford	DCR6428	N.D. Miss.	Clarksdale
7/17/1964	City of Jackson v. Catchings	3541	S.D. Miss.	Jackson
7/17/1964	City of Jackson v. McNair	3542	S.D. Miss.	Jackson
7/17/1964	Mississippi v. Carmichael	GCR6416	N.D. Miss.	Greenville
7/17/1964	City of Drew v. McNair	GCR6417	N.D. Miss.	Greenville
7/17/1964	City of Drew v. Yarrow	GCR6418	N.D. Miss.	Greenville
7/17/1964	City of Drew v. McLaurin	GCR6419	N.D. Miss.	Greenville
7/17/1964	City of Drew v. Harris	GCR6420	N.D. Miss.	Greenville
7/17/1964	Mississippi v. Carmichael	DCR6430	N.D. Miss.	Clarksdale
7/17/1964	Mississippi v. Biggs	8356	S.D. Miss.	Biloxi
7/17/1964	Mississippi v. Reese	8357	S.D. Miss.	Biloxi
7/20/1964	City of Jackson v. Henry	3543	S.D. Miss.	Jackson
7/20/1964	City of Jackson v. Herring	3544	S.D. Miss.	Jackson
7/20/1964	City of Jackson v. Herring	3545	S.D. Miss.	Jackson

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7/20/1964	City of Jackson v. Herron	3546	S.D. Miss.	Jackson
7/20/1964	City of Greenwood v. Carmichael	GCR6429	N.D. Miss.	Greenville
7/21/1964	City of Drew v. McNair	GCR6430	N.D. Miss.	Greenville
7/21/1964	City of Drew v. Harris	GCR6431	N.D. Miss.	Greenville
7/21/1964	City of Drew v. McLaurin	GCR6432	N.D. Miss.	Greenville
7/21/1964	City of Drew v. McLaurin	GCR6433	N.D. Miss.	Greenville
7/21/1964	City of Drew v. Yarrow	GCR6434	N.D. Miss.	Greenville
7/22/1964	City of Clarksdale v. Gertge	DCR6448	N.D. Miss.	Clarksdale
7/23/1964	Mississippi v. Else	5196	S.D. Miss.	Meridian
7/23/1964	Mississippi v. Else	5197	S.D. Miss.	Meridian
7/23/1964	Mississippi v. Kotz	5198	S.D. Miss.	Meridian
7/23/1964	Mississippi v. Kotz	5199	S.D. Miss.	Meridian
7/23/1964	Mississippi v. Kotz	5200	S.D. Miss.	Meridian
7/23/1964	City of Greenwood v. Weathers	GCR6435	N.D. Miss.	Greenville
7/23/1964	City of Greenwood v. Weathers	GCR6436	N.D. Miss.	Greenville
7/23/1964	City of Greenwood v. Brooks	GCR6437	N.D. Miss.	Greenville
7/23/1964	City of Greenwood v. Albertz	GCR6438	N.D. Miss.	Greenville
7/23/1964	Mississippi v. White	ECR6454	N.D. Miss.	Aberdeen
7/24/1964	Mississippi v. Morton	3547	S.D. Miss.	Jackson
7/24/1964	City of Clarksdale v. Brooks	DCR6449	N.D. Miss.	Clarksdale
7/27/1964	City of Jackson v. Howard	3548	S.D. Miss.	Jackson
7/27/1964	Mississippi v. Horn	3549	S.D. Miss.	Jackson
7/27/1964	City of Jackson v. Horn	3550	S.D. Miss.	Jackson
7/27/1964	Mississippi v. Hossiey	3551	S.D. Miss.	Jackson
7/27/1964	City of Jackson v. Hough	3552	S.D. Miss.	Jackson
7/27/1964	Mississippi v. Hough	3553	S.D. Miss.	Jackson
7/27/1964	City of Meridian v. McGee	5201	S.D. Miss.	Meridian
7/27/1964	City of Holly Springs v. Rubin	WCR6430	N.D. Miss.	Oxford
7/27/1964	City of Holly Springs v. Berry	WCR6431	N.D. Miss.	Oxford
7/27/1964	Mississippi v. Goodloe	DCR6450	N.D. Miss.	Clarksdale
7/28/1964	City of Clarksdale v. Brooks	DCR6451	N.D. Miss.	Clarksdale
7/28/1964	City of Clarksdale v. Johnson	DCR6452	N.D. Miss.	Clarksdale
7/29/1964	Mississippi v. Smith	3554	S.D. Miss.	Jackson
7/31/1964	Town of Byhalia v. Taylor	WCR6432	N.D. Miss.	Oxford
8/3/1964	City of Jackson v. Huff	3556	S.D. Miss.	Jackson
8/3/1964	City of Jackson v. Jackson	3557	S.D. Miss.	Jackson
8/3/1964	Mississippi v. Moman	3558	S.D. Miss.	Jackson
8/3/1964	Mississippi v. Hutchinson	3559	S.D. Miss.	Jackson
8/3/1964	City of Jackson v. Island	3560	S.D. Miss.	Jackson
8/3/1964	City of Jackson v. Howard	3561	S.D. Miss.	Jackson
8/3/1964	City of Greenwood v. Harris	GCR6439	N.D. Miss.	Greenville
8/3/1964	City of Greenwood v. Sharpe	GCR6440	N.D. Miss.	Greenville

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8/3/1964	City of Greenwood v. Paul	GCR6441	N.D. Miss.	Greenville
8/3/1964	City of Greenwood v. Albertz	GCR6442	N.D. Miss.	Greenville
8/3/1964	City of Greenwood v. Albertz	GCR6443	N.D. Miss.	Greenville
8/3/1964	City of Greenwood v. Hodes	GCR6444	N.D. Miss.	Greenville
8/3/1964	City of Greenwood v. McGee	GCR6445	N.D. Miss.	Greenville
8/4/1964	Mississippi v. Foner	3562	S.D. Miss.	Jackson
8/4/1964	Mississippi v. Wright	3563	S.D. Miss.	Jackson
8/4/1964	Mississippi v. Manoff	3564	S.D. Miss.	Jackson
8/4/1964	Mississippi v. Gunn	3565	S.D. Miss.	Jackson
8/4/1964	Mississippi v. Soloff	3566	S.D. Miss.	Jackson
8/4/1964	Mississippi v. Packer	3567	S.D. Miss.	Jackson
8/4/1964	City of Greenwood v. Gordon	GCR6446	N.D. Miss.	Greenville
8/4/1964	City of Greenwood v. Turner	GCR6447	N.D. Miss.	Greenville
8/4/1964	City of Greenwood v. Masters	GCR6448	N.D. Miss.	Greenville
8/6/1964	Mississippi v. Glenn	1344	S.D. Miss.	Hattiesburg
8/7/1964	City of Holly Springs v. Sellers	WCR6437	N.D. Miss.	Oxford
8/7/1964	Mississippi v. Weaver	DCR6453	N.D. Miss.	Clarksdale
8/7/1964	Mississippi v. Graham	DCR6454	N.D. Miss.	Clarksdale
8/8/1964	City of Drew v. Williams	GCR6449	N.D. Miss.	Greenville
8/8/1964	City of Drew v. Miller	GCR6450	N.D. Miss.	Greenville
8/8/1964	City of Marks v. Kassler	DCR6455	N.D. Miss.	Clarksdale
8/10/1964	Mississippi v. Hilligas	3568	S.D. Miss.	Jackson
8/10/1964	Mississippi v. Dennis	3569	S.D. Miss.	Jackson
8/10/1964	City of Jackson v. Jasper	3570	S.D. Miss.	Jackson
8/10/1964	City of Jackson v. Jackson	3571	S.D. Miss.	Jackson
8/10/1964	City of Jackson v. Johnson	3572	S.D. Miss.	Jackson
8/10/1964	City of Jackson v. Jackson	3573	S.D. Miss.	Jackson
8/10/1964	City of Jackson v. Jackson	3574	S.D. Miss.	Jackson
8/10/1964	City of Jackson v. Williams	3575	S.D. Miss.	Jackson
8/10/1964	Mississippi v. Clark	3576	S.D. Miss.	Jackson
8/10/1964	City of Greenwood v. Handy	GCR6451	N.D. Miss.	Greenville
8/13/1964	City of Drew v. Hexter	GCR6452	N.D. Miss.	Greenville
8/13/1964	City of Pascagoula v. Parker	8358	S.D. Miss.	Biloxi
8/13/1964	City of Pascagoula v. Reeves	8359	S.D. Miss.	Biloxi
8/13/1964	City of Pascagoula v. Watson	8360	S.D. Miss.	Biloxi
8/13/1964	City of Pascagoula v. Martin	8361	S.D. Miss.	Biloxi
8/13/1964	City of Pascagoula v. Watson	8362	S.D. Miss.	Biloxi
8/13/1964	City of Pascagoula v. Liddell	8363	S.D. Miss.	Biloxi
8/13/1964	City of Pascagoula v. Walker	8364	S.D. Miss.	Biloxi
8/13/1964	City of Pascagoula v. Watson	8365	S.D. Miss.	Biloxi
8/13/1964	City of Pascagoula v. Hubbard	8366	S.D. Miss.	Biloxi
8/13/1964	City of Pascagoula v. Stallworth	8367	S.D. Miss.	Biloxi

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8/13/1964	City of Pascagoula v. Liddell	8368	S.D. Miss.	Biloxi
8/13/1964	City of Pascagoula v. Norwood	8369	S.D. Miss.	Biloxi
8/13/1964	City of Pascagoula v. Washington	8370	S.D. Miss.	Biloxi
8/13/1964	City of Pascagoula v. Wagner	8371	S.D. Miss.	Biloxi
8/13/1964	City of Pascagoula v. Francis	8372	S.D. Miss.	Biloxi
8/13/1964	City of Pascagoula v. Burt	8373	S.D. Miss.	Biloxi
8/13/1964	City of Pascagoula v. Graves	8374	S.D. Miss.	Biloxi
8/13/1964	City of Pascagoula v. Davis	8375	S.D. Miss.	Biloxi
8/13/1964	City of Pascagoula v. Jackson	8376	S.D. Miss.	Biloxi
8/13/1964	City of Pascagoula v. Booker	8377	S.D. Miss.	Biloxi
8/13/1964	City of Pascagoula v. Davis	8378	S.D. Miss.	Biloxi
8/13/1964	City of Pascagoula v. Jackson	8379	S.D. Miss.	Biloxi
8/13/1964	City of Pascagoula v. Liddell	8380	S.D. Miss.	Biloxi
8/13/1964	City of Pascagoula v. Davis	8381	S.D. Miss.	Biloxi
8/13/1964	City of Pascagoula v. McDonald	8382	S.D. Miss.	Biloxi
8/13/1964	City of Pascagoula v. Riley	8383	S.D. Miss.	Biloxi
8/13/1964	City of Pascagoula v. Payton	8384	S.D. Miss.	Biloxi
8/13/1964	City of Pascagoula v. Stevenson	8385	S.D. Miss.	Biloxi
8/13/1964	City of Pascagoula v. Gill	8386	S.D. Miss.	Biloxi
8/13/1964	City of Pascagoula v. Tessaro	8387	S.D. Miss.	Biloxi
8/13/1964	City of Pascagoula v. Miller	8388	S.D. Miss.	Biloxi
8/13/1964	City of Pascagoula v. Watson	8389	S.D. Miss.	Biloxi
8/13/1964	City of Pascagoula v. Reeves	8390	S.D. Miss.	Biloxi
8/13/1964	City of Pascagoula v. Liddell	8391	S.D. Miss.	Biloxi
8/13/1964	City of Pascagoula v. Thompson	8392	S.D. Miss.	Biloxi
8/13/1964	City of Pascagoula v. Walker	8393	S.D. Miss.	Biloxi
8/13/1964	City of Pascagoula v. Wright	8394	S.D. Miss.	Biloxi
8/13/1964	City of Pascagoula v. Gladney	8395	S.D. Miss.	Biloxi
8/13/1964	City of Pascagoula v. Ross	8396	S.D. Miss.	Biloxi
8/13/1964	City of Pascagoula v. Dickerson	8397	S.D. Miss.	Biloxi
8/13/1964	City of Pascagoula v. Riley	8398	S.D. Miss.	Biloxi
8/13/1964	City of Pascagoula v. Burton	8399	S.D. Miss.	Biloxi
8/13/1964	City of Pascagoula v. Simmons	8400	S.D. Miss.	Biloxi
8/13/1964	City of Pascagoula v. Jenkins	8401	S.D. Miss.	Biloxi
8/13/1964	City of Pascagoula v. Richburg	8402	S.D. Miss.	Biloxi
8/13/1964	City of Pascagoula v. Robinson	8403	S.D. Miss.	Biloxi
8/13/1964	City of Pascagoula v. Robinson	8404	S.D. Miss.	Biloxi
8/13/1964	City of Pascagoula v. Gill	8405	S.D. Miss.	Biloxi
8/13/1964	City of Pascagoula v. Watson	8406	S.D. Miss.	Biloxi
8/13/1964	City of Pascagoula v. Lett	8407	S.D. Miss.	Biloxi
8/13/1964	City of Pascagoula v. Ross	8408	S.D. Miss.	Biloxi
8/13/1964	City of Pascagoula v. Millar	8409	S.D. Miss.	Biloxi

<i>Removed</i>	<i>Case Name</i>	<i>Docket No.</i>	<i>District</i>	<i>Division</i>
8/13/1964	City of Pascagoula v. Burton	8410	S.D. Miss.	Biloxi
8/13/1964	City of Pascagoula v. McArthur	8411	S.D. Miss.	Biloxi
8/13/1964	City of Pascagoula v. Fountain	8412	S.D. Miss.	Biloxi
8/13/1964	City of Pascagoula v. Richardon	8413	S.D. Miss.	Biloxi
8/13/1964	City of Pascagoula v. Fagan	8414	S.D. Miss.	Biloxi
8/13/1964	City of Pascagoula v. Barnhill	8415	S.D. Miss.	Biloxi
8/13/1964	City of Pascagoula v. Jenkins	8416	S.D. Miss.	Biloxi
8/13/1964	City of Pascagoula v. Roberts	8417	S.D. Miss.	Biloxi
8/13/1964	City of Pascagoula v. Millar	8418	S.D. Miss.	Biloxi
8/13/1964	City of Pascagoula v. Bradley	8419	S.D. Miss.	Biloxi
8/13/1964	City of Pascagoula v. Davis	8420	S.D. Miss.	Biloxi
8/13/1964	City of Pascagoula v. Grandison	8421	S.D. Miss.	Biloxi
8/13/1964	City of Pascagoula v. Long	8422	S.D. Miss.	Biloxi
8/13/1964	City of Pascagoula v. Lett	8423	S.D. Miss.	Biloxi
8/13/1964	City of Pascagoula v. Washington	8424	S.D. Miss.	Biloxi
8/13/1964	City of Pascagoula v. Carter	8425	S.D. Miss.	Biloxi
8/13/1964	City of Pascagoula v. Washington	8426	S.D. Miss.	Biloxi
8/17/1964	Mississippi v. O'Neal	3577	S.D. Miss.	Jackson
8/17/1964	Mississippi v. Trumpauer	3578	S.D. Miss.	Jackson
8/17/1964	City of Jackson v. Williams	3579	S.D. Miss.	Jackson
8/17/1964	City of Jackson v. Woods	3580	S.D. Miss.	Jackson
8/17/1964	City of Jackson v. Wilson	3581	S.D. Miss.	Jackson
8/17/1964	City of Jackson v. Griggs	3582	S.D. Miss.	Jackson
8/17/1964	Mississippi v. Wright	3583	S.D. Miss.	Jackson
8/17/1964	City of Jackson v. Rutledge	3584	S.D. Miss.	Jackson
8/17/1964	City of Jackson v. Rutledge	3585	S.D. Miss.	Jackson
8/17/1964	City of Jackson v. Frazier	3586	S.D. Miss.	Jackson
8/17/1964	City of Holly Springs v. Cieciora	WCR6438	N.D. Miss.	Oxford
8/17/1964	City of Greenwood v. Harrison	GCR6453	N.D. Miss.	Greenville
8/18/1964	City of Greenwood v. Turner	GCR6454	N.D. Miss.	Greenville
8/18/1964	Mississippi v. Harper	GCR6455	N.D. Miss.	Greenville
8/18/1964	Mississippi v. Nelson	GCR6456	N.D. Miss.	Greenville
8/18/1964	Mississippi v. Delaney	GCR6457	N.D. Miss.	Greenville
8/18/1964	Mississippi v. Delaney	GCR6458	N.D. Miss.	Greenville
8/19/1964	City of Hattiesburg v. Achtenberg	1345	S.D. Miss.	Hattiesburg
8/19/1964	City of Hattiesburg v. Adickes	1346	S.D. Miss.	Hattiesburg
8/19/1964	City of Hattiesburg v. Edwards	1347	S.D. Miss.	Hattiesburg
8/19/1964	City of Hattiesburg v. Jackson	1348	S.D. Miss.	Hattiesburg
8/19/1964	City of Hattiesburg v. Jackson	1349	S.D. Miss.	Hattiesburg
8/19/1964	City of Hattiesburg v. Jackson	1350	S.D. Miss.	Hattiesburg
8/19/1964	City of Hattiesburg v. Jones	1351	S.D. Miss.	Hattiesburg
8/19/1964	City of Hattiesburg v. Patterson	1352	S.D. Miss.	Hattiesburg

<i>Removed</i>	<i>Case Name</i>	<i>Docket No.</i>	<i>District</i>	<i>Division</i>
8/19/1964	Mississippi v. Bridgeforth	ECR6458	N.D. Miss.	Aberdeen
8/20/1964	Mississippi v. Kendrick	DCR6456	N.D. Miss.	Clarksdale
8/20/1964	City of Ruleville v. Perry	GCR6459	N.D. Miss.	Greenville
8/20/1964	City of Drew v. Smith	GCR6460	N.D. Miss.	Greenville
8/20/1964	City of Indianola v. Hexter	GCR6461	N.D. Miss.	Greenville
8/21/1964	City of Greenwood v. McGhee	GCR6462	N.D. Miss.	Greenville
8/21/1964	City of Greenwood v. Pruitt	GCR6463	N.D. Miss.	Greenville
8/21/1964	City of Greenwood v. Edwards	GCR6464	N.D. Miss.	Greenville
8/21/1964	City of Greenwood v. Handy	GCR6465	N.D. Miss.	Greenville
8/21/1964	City of Greenwood v. Parker	GCR6466	N.D. Miss.	Greenville
8/21/1964	City of Greenwood v. Austin	GCR6467	N.D. Miss.	Greenville
8/21/1964	City of Greenwood v. Craft	GCR6468	N.D. Miss.	Greenville
8/21/1964	City of Greenwood v. Harris	GCR6469	N.D. Miss.	Greenville
8/22/1964	Mississippi v. Holbrook	3587	S.D. Miss.	Jackson
8/22/1964	Mississippi v. Sorenson	3588	S.D. Miss.	Jackson
8/24/1964	Mississippi v. Hartfield	1353	S.D. Miss.	Hattiesburg
8/24/1964	Mississippi v. Nixon	1354	S.D. Miss.	Hattiesburg
8/24/1964	Mississippi v. Stevenson	1355	S.D. Miss.	Hattiesburg
8/24/1964	Mississippi v. McGee	1356	S.D. Miss.	Hattiesburg
8/24/1964	Mississippi v. Martin	1357	S.D. Miss.	Hattiesburg
8/24/1964	Mississippi v. Wilson	1358	S.D. Miss.	Hattiesburg
8/24/1964	Mississippi v. Hathorn	1359	S.D. Miss.	Hattiesburg
8/24/1964	Mississippi v. McDonald	1360	S.D. Miss.	Hattiesburg
8/24/1964	Mississippi v. Rooney	1361	S.D. Miss.	Hattiesburg
8/24/1964	Mississippi v. Jones	1362	S.D. Miss.	Hattiesburg
8/24/1964	Mississippi v. Walker	1363	S.D. Miss.	Hattiesburg
8/24/1964	Mississippi v. Palmer	1364	S.D. Miss.	Hattiesburg
8/24/1964	Mississippi v. Steffenson	1365	S.D. Miss.	Hattiesburg
8/24/1964	City of McComb v. Lee	3589	S.D. Miss.	Jackson
8/24/1964	Town of Anguilla v. Grant	4373	S.D. Miss.	Vicksburg
8/24/1964	Town of Anguilla v. Wright	4374	S.D. Miss.	Vicksburg
8/27/1964	City of Magnolia v. McGhee	3592	S.D. Miss.	Jackson
9/3/1964	Mississippi v. Brisben	ECR6459	N.D. Miss.	Aberdeen
9/9/1964	City of Amory v. Carr	ECR6460	N.D. Miss.	Aberdeen
9/11/1964	City of Jackson v. Camper	3594	S.D. Miss.	Jackson
9/12/1964	City of Indianola v. Brown	GCR6471	N.D. Miss.	Greenville
9/12/1964	City of Indianola v. Scattergood	GCR6472	N.D. Miss.	Greenville
9/12/1964	City of Indianola v. Perry	GCR6473	N.D. Miss.	Greenville
9/12/1964	City of Indianola v. Kaminsky	GCR6474	N.D. Miss.	Greenville
9/12/1964	City of Indianola v. Marshall	GCR6475	N.D. Miss.	Greenville
9/12/1964	City of Indianola v. Dann	GCR6476	N.D. Miss.	Greenville
9/12/1964	City of Indianola v. Harris	GCR6477	N.D. Miss.	Greenville

<i>Removed</i>	<i>Case Name</i>	<i>Docket No.</i>	<i>District</i>	<i>Division</i>
9/15/1964	City of Indianola v. Donaldson	GCR6478	N.D. Miss.	Greenville
9/15/1964	City of Indianola v. Smith	GCR6479	N.D. Miss.	Greenville
9/15/1964	City of Indianola v. Brumfield	GCR6480	N.D. Miss.	Greenville
9/15/1964	City of Indianola v. Stewart	GCR6481	N.D. Miss.	Greenville
9/15/1964	City of Indianola v. Frey	GCR6482	N.D. Miss.	Greenville
9/15/1964	City of Indianola v. Williams	GCR6483	N.D. Miss.	Greenville
9/15/1964	City of Indianola v. McGee	GCR6484	N.D. Miss.	Greenville
9/15/1964	City of Indianola v. Hampton	GCR6485	N.D. Miss.	Greenville
9/15/1964	City of Indianola v. Davis	GCR6486	N.D. Miss.	Greenville
9/15/1964	City of Indianola v. Higgins	GCR6487	N.D. Miss.	Greenville
9/15/1964	City of Indianola v. Rogers	GCR6488	N.D. Miss.	Greenville
9/15/1964	City of Indianola v. Brown	GCR6489	N.D. Miss.	Greenville
9/15/1964	City of Indianola v. Jones	GCR6490	N.D. Miss.	Greenville
9/15/1964	City of Indianola v. Bell	GCR6491	N.D. Miss.	Greenville
9/15/1964	City of Indianola v. Taylor	GCR6492	N.D. Miss.	Greenville
9/15/1964	City of Indianola v. Lane	GCR6493	N.D. Miss.	Greenville
9/15/1964	City of Indianola v. Smith	GCR6494	N.D. Miss.	Greenville
9/15/1964	City of Indianola v. Flowers	GCR6495	N.D. Miss.	Greenville
9/15/1964	City of Indianola v. Hughes	GCR6496	N.D. Miss.	Greenville
9/21/1964	City of Jackson v. Thrash	3595	S.D. Miss.	Jackson
9/21/1964	City of Jackson v. Fiering	3596	S.D. Miss.	Jackson
9/21/1964	City of Jackson v. Wickliff	3597	S.D. Miss.	Jackson
9/21/1964	Mississippi v. Scott	DCR6457	N.D. Miss.	Clarksdale
9/22/1964	City of Jackson v. Wickliff	3598	S.D. Miss.	Jackson
9/22/1964	City of Jackson v. Thrash	3599	S.D. Miss.	Jackson
9/22/1964	Mississippi v. Thomas	DCR6458	N.D. Miss.	Clarksdale
9/22/1964	Mississippi v. Palmer	DCR6459	N.D. Miss.	Clarksdale
9/22/1964	Mississippi v. Washington	DCR6460	N.D. Miss.	Clarksdale
9/22/1964	City of Columbus v. Ewen	ECR6466	N.D. Miss.	Aberdeen
9/25/1964	Pike County v. Dillon	3600	S.D. Miss.	Jackson
9/28/1964	Mississippi v. Washington	3601	S.D. Miss.	Jackson
9/28/1964	Mississippi v. Chinn	3602	S.D. Miss.	Jackson
9/28/1964	City of Jackson v. Ferguson	3603	S.D. Miss.	Jackson
9/29/1964	Mississippi v. Lewis	3604	S.D. Miss.	Jackson
9/29/1964	Mississippi v. Ard	3605	S.D. Miss.	Jackson
9/29/1964	Mississippi v. Hills	3606	S.D. Miss.	Jackson
9/29/1964	Mississippi v. Banks	3607	S.D. Miss.	Jackson
9/29/1964	Mississippi v. Mallard	3608	S.D. Miss.	Jackson
9/29/1964	Mississippi v. Tatum	3609	S.D. Miss.	Jackson
9/29/1964	Mississippi v. Thomas	3610	S.D. Miss.	Jackson
9/29/1964	Mississippi v. Ashley	3611	S.D. Miss.	Jackson
9/29/1964	Mississippi v. Thomas	3612	S.D. Miss.	Jackson

<i>Removed</i>	<i>Case Name</i>	<i>Docket No.</i>	<i>District</i>	<i>Division</i>
9/29/1964	Mississippi v. Knox	3613	S.D. Miss.	Jackson
9/29/1964	Mississippi v. Anderson	3614	S.D. Miss.	Jackson
9/29/1964	Mississippi v. Tate	3615	S.D. Miss.	Jackson
9/29/1964	Mississippi v. Todd	3616	S.D. Miss.	Jackson
9/29/1964	Mississippi v. Allen	3617	S.D. Miss.	Jackson
10/1/1964	Mississippi v. Caston	3618	S.D. Miss.	Jackson
10/1/1964	Mississippi v. Caston	3619	S.D. Miss.	Jackson
10/1/1964	Mississippi v. Allen	3620	S.D. Miss.	Jackson
10/1/1964	Mississippi v. Allen	3621	S.D. Miss.	Jackson
10/1/1964	Mississippi v. Stone	3622	S.D. Miss.	Jackson
10/1/1964	Mississippi v. Beachman	3623	S.D. Miss.	Jackson
10/1/1964	County of Neshora v. Schiffman	5202	S.D. Miss.	Meridian
10/2/1964	City of Belzoni v. Myles	GCR6498	N.D. Miss.	Greenville
10/2/1964	City of Belzoni v. Myles	GCR6499	N.D. Miss.	Greenville
10/2/1964	Town of Sunflower v. Donn	GCR64100	N.D. Miss.	Greenville
10/7/1964	Mississippi v. Harvey	3624	S.D. Miss.	Jackson
10/9/1964	City of Jackson v. Thrash	3628	S.D. Miss.	Jackson
10/12/1964	Mississippi v. Parker	3629	S.D. Miss.	Jackson
10/12/1964	Mississippi v. Parker	3630	S.D. Miss.	Jackson
10/12/1964	Mississippi v. Allen	3631	S.D. Miss.	Jackson
10/12/1964	Mississippi v. Lewis	3632	S.D. Miss.	Jackson
10/12/1964	Mississippi v. Caston	3633	S.D. Miss.	Jackson
10/12/1964	Mississippi v. Allen	3634	S.D. Miss.	Jackson
10/14/1964	Mississippi v. Marsalis	3635	S.D. Miss.	Jackson
10/20/1964	Mississippi v. Bridgeforth	ECR6473	N.D. Miss.	Aberdeen
10/28/1964	City of Jackson v. Smith	3638	S.D. Miss.	Jackson
10/28/1964	City of Jackson v. Coggeshall	3639	S.D. Miss.	Jackson
10/28/1964	City of Jackson v. Gillon	3640	S.D. Miss.	Jackson
10/28/1964	City of Jackson v. Park	3641	S.D. Miss.	Jackson
10/28/1964	City of Jackson v. Burnham	3642	S.D. Miss.	Jackson
10/28/1964	City of Jackson v. Brown	3643	S.D. Miss.	Jackson
10/28/1964	City of Jackson v. Cotton	3644	S.D. Miss.	Jackson
10/28/1964	Mississippi v. Bass	GCR64102	N.D. Miss.	Greenville
10/28/1964	Mississippi v. Ware	GCR64103	N.D. Miss.	Greenville
10/28/1964	Mississippi v. Carpenter	GCR64104	N.D. Miss.	Greenville
11/2/1964	City of Canton v. Raymond	3647	S.D. Miss.	Jackson
11/4/1964	City of Jackson v. McHugh	3648	S.D. Miss.	Jackson
11/5/1964	Mississippi v. Robinson	ECR6474	N.D. Miss.	Aberdeen
11/5/1964	Mississippi v. Robinson	ECR6475	N.D. Miss.	Aberdeen
11/5/1964	Mississippi v. Williamson	ECR6476	N.D. Miss.	Aberdeen
11/5/1964	Mississippi v. Williamson	ECR6477	N.D. Miss.	Aberdeen
11/5/1964	Mississippi v. Williamson	ECR6478	N.D. Miss.	Aberdeen

<i>Removed</i>	<i>Case Name</i>	<i>Docket No.</i>	<i>District</i>	<i>Division</i>
11/6/1964	City of West Point v. Brooks	ECR6479	N.D. Miss.	Aberdeen
11/6/1964	City of West Point v. Bernard	ECR6480	N.D. Miss.	Aberdeen
11/6/1964	City of West Point v. Gilman	ECR6481	N.D. Miss.	Aberdeen
11/6/1964	City of West Point v. Bell	ECR6482	N.D. Miss.	Aberdeen
11/6/1964	City of West Point v. Lewis	ECR6483	N.D. Miss.	Aberdeen
11/6/1964	Mississippi v. Schrader	ECR6484	N.D. Miss.	Aberdeen
11/6/1964	City of Indianola v. Smith	GCR64105	N.D. Miss.	Greenville
11/6/1964	City of Indianola v. McGee	GCR64106	N.D. Miss.	Greenville
11/6/1964	City of Indianola v. Winter	GCR64107	N.D. Miss.	Greenville
11/6/1964	City of Indianola v. Brown	GCR64108	N.D. Miss.	Greenville
11/6/1964	City of Indianola v. Williams	GCR64109	N.D. Miss.	Greenville
11/6/1964	City of Indianola v. McKinley	GCR64110	N.D. Miss.	Greenville
11/9/1964	City of Meridian v. Golick	5210	S.D. Miss.	Meridian
11/9/1964	City of Meridian v. Gross	5211	S.D. Miss.	Meridian
11/9/1964	City of Meridian v. Henderson	5212	S.D. Miss.	Meridian
11/9/1964	City of Meridian v. Kemmerer	5213	S.D. Miss.	Meridian
11/9/1964	City of Meridian v. Lowenstein	5214	S.D. Miss.	Meridian
11/9/1964	City of Columbus v. Phillips	ECR6485	N.D. Miss.	Aberdeen
11/9/1964	City of Columbus v. Schulman	ECR6486	N.D. Miss.	Aberdeen
11/27/1964	City of Columbus v. Kashiwagi	ECR6487	N.D. Miss.	Aberdeen
11/27/1964	City of Columbus v. Edmands	ECR6488	N.D. Miss.	Aberdeen
11/30/1964	City of Columbus v. Buckley	ECR6489	N.D. Miss.	Aberdeen
11/30/1964	City of Columbus v. Hamburg	ECR6490	N.D. Miss.	Aberdeen
12/7/1964	Mississippi v. Darden	3652	S.D. Miss.	Jackson
12/7/1964	Mississippi v. Delott	3653	S.D. Miss.	Jackson
12/9/1964	Mississippi v. Trapp	3654	S.D. Miss.	Jackson
12/9/1964	Mississippi v. Palmore	3655	S.D. Miss.	Jackson
12/9/1964	Mississippi v. Cole	3656	S.D. Miss.	Jackson
12/9/1964	Mississippi v. White	3657	S.D. Miss.	Jackson
12/9/1964	Mississippi v. Nixon	3658	S.D. Miss.	Jackson
12/9/1964	Mississippi v. Morton	3659	S.D. Miss.	Jackson
12/9/1964	Mississippi v. Meeks	3660	S.D. Miss.	Jackson
12/9/1964	Mississippi v. Haughland	3661	S.D. Miss.	Jackson
12/9/1964	Mississippi v. Glass	3662	S.D. Miss.	Jackson
12/9/1964	Mississippi v. Hall	3663	S.D. Miss.	Jackson
12/9/1964	Mississippi v. Craun	3664	S.D. Miss.	Jackson
12/9/1964	Mississippi v. Badentscher	3665	S.D. Miss.	Jackson
12/14/1964	City of Columbus v. Maurer	ECR6491	N.D. Miss.	Aberdeen
12/21/1964	City of Laurel v. Everett	1369	S.D. Miss.	Hattiesburg
12/21/1964	City of Laurel v. Foster	1370	S.D. Miss.	Hattiesburg
12/21/1964	City of Laurel v. Hartfield	1371	S.D. Miss.	Hattiesburg
12/21/1964	City of Laurel v. Hardaway	1372	S.D. Miss.	Hattiesburg

<i>Removed</i>	<i>Case Name</i>	<i>Docket No.</i>	<i>District</i>	<i>Division</i>
12/21/1964	City of Laurel v. Jackson	1373	S.D. Miss.	Hattiesburg
12/21/1964	City of Laurel v. McGauley	1374	S.D. Miss.	Hattiesburg
12/24/1964	Mississippi v. Perry	GCR64111	N.D. Miss.	Greenville
1/4/1965	Mississippi v. Jewett	3667	S.D. Miss.	Jackson
1/4/1965	Mississippi v. Jewett	3668	S.D. Miss.	Jackson
1/4/1965	Mississippi v. Jones	3669	S.D. Miss.	Jackson
1/4/1965	Mississippi v. Jones	3670	S.D. Miss.	Jackson
1/4/1965	Mississippi v. Merritt	3671	S.D. Miss.	Jackson
1/4/1965	Mississippi v. Merritt	3672	S.D. Miss.	Jackson
1/4/1965	Mississippi v. Myers	3673	S.D. Miss.	Jackson
1/4/1965	Mississippi v. Myers	3674	S.D. Miss.	Jackson
1/4/1965	Mississippi v. Veal	3675	S.D. Miss.	Jackson
1/4/1965	Mississippi v. Veal	3676	S.D. Miss.	Jackson
1/4/1965	Mississippi v. Palmer	3677	S.D. Miss.	Jackson
1/4/1965	Mississippi v. Palmer	3678	S.D. Miss.	Jackson
1/4/1965	Mississippi v. Watts	3679	S.D. Miss.	Jackson
1/4/1965	Mississippi v. Bosley	3680	S.D. Miss.	Jackson
1/4/1965	Mississippi v. Bosley	3681	S.D. Miss.	Jackson
1/4/1965	Mississippi v. Bosley	3682	S.D. Miss.	Jackson
1/11/1965	City of Vicksburg v. Jackson	4375	S.D. Miss.	Vicksburg
1/11/1965	City of Vicksburg v. Johnson	4376	S.D. Miss.	Vicksburg
1/11/1965	City of Vicksburg v. Coleman	4377	S.D. Miss.	Vicksburg
1/13/1965	City of Vicksburg v. Davis	4378	S.D. Miss.	Vicksburg
1/13/1965	Mississippi v. Green	ECR6520	N.D. Miss.	Aberdeen
1/13/1965	City of West Point v. Crawford	ECR6521	N.D. Miss.	Aberdeen
1/13/1965	City of West Point v. Sykes	ECR6522	N.D. Miss.	Aberdeen
1/13/1965	City of West Point v. Brooks	ECR6523	N.D. Miss.	Aberdeen
1/13/1965	City of West Point v. Shanklin	ECR6524	N.D. Miss.	Aberdeen
1/13/1965	City of West Point v. Higson	ECR6525	N.D. Miss.	Aberdeen
1/13/1965	City of West Point v. Wilson	ECR6526	N.D. Miss.	Aberdeen
1/13/1965	City of West Point v. Gilman	ECR6527	N.D. Miss.	Aberdeen
1/13/1965	City of West Point v. Gilman	ECR6528	N.D. Miss.	Aberdeen
1/13/1965	City of West Point v. Brown	ECR6529	N.D. Miss.	Aberdeen
1/13/1965	City of West Point v. Buffington	ECR6530	N.D. Miss.	Aberdeen
1/15/1965	City of Natchez v. Clark	4393	S.D. Miss.	Vicksburg
1/15/1965	City of Natchez v. Washington	4394	S.D. Miss.	Vicksburg
1/15/1965	City of Natchez v. Avery	4395	S.D. Miss.	Vicksburg
1/15/1965	City of Natchez v. Jemmott	4396	S.D. Miss.	Vicksburg
1/15/1965	City of Natchez v. Atdkins	4397	S.D. Miss.	Vicksburg
1/15/1965	City of Natchez v. Green	4398	S.D. Miss.	Vicksburg
1/15/1965	City of Natchez v. Cress	4399	S.D. Miss.	Vicksburg
1/15/1965	City of Natchez v. Williams	4400	S.D. Miss.	Vicksburg

<i>Removed</i>	<i>Case Name</i>	<i>Docket No.</i>	<i>District</i>	<i>Division</i>
1/15/1965	City of Natchez v. Gilmore	4401	S.D. Miss.	Vicksburg
1/15/1965	City of Natchez v. Easton	4402	S.D. Miss.	Vicksburg
1/15/1965	City of Natchez v. McFarland	4403	S.D. Miss.	Vicksburg
1/15/1965	City of Natchez v. Martin	4404	S.D. Miss.	Vicksburg
1/16/1965	Mississippi v. Raymond	3700	S.D. Miss.	Jackson
1/20/1965	Mississippi v. Ruffin	1382	S.D. Miss.	Hattiesburg
1/26/1965	Mississippi v. Carver	ECR6531	N.D. Miss.	Aberdeen
2/2/1965	City of Columbus v. Higson	ECR6532	N.D. Miss.	Aberdeen
2/17/1965	City of Indianola v. Winn	GCR6515	N.D. Miss.	Greenville
3/2/1965	Mississippi v. Kaslo	5219	S.D. Miss.	Meridian
3/3/1965	City of Meridian v. Kaslo	5220	S.D. Miss.	Meridian
3/3/1965	City of Meridian v. Crowell	5221	S.D. Miss.	Meridian
3/3/1965	City of Meridian v. Harris	5222	S.D. Miss.	Meridian
3/3/1965	City of Meridian v. Smith	5223	S.D. Miss.	Meridian
3/3/1965	City of Meridian v. Coleman	5224	S.D. Miss.	Meridian
3/3/1965	City of Meridian v. Wright	5225	S.D. Miss.	Meridian
3/3/1965	City of Meridian v. Brown	5226	S.D. Miss.	Meridian
3/3/1965	City of Meridian v. Moss	5227	S.D. Miss.	Meridian
3/3/1965	City of Meridian v. Morse	5228	S.D. Miss.	Meridian
3/3/1965	City of Meridian v. Knighton	5229	S.D. Miss.	Meridian
3/3/1965	City of Meridian v. Tinsley	5230	S.D. Miss.	Meridian
3/3/1965	City of Meridian v. Smith	5231	S.D. Miss.	Meridian
3/3/1965	City of Meridian v. Black	5232	S.D. Miss.	Meridian
3/3/1965	City of Meridian v. Wright	5233	S.D. Miss.	Meridian
3/3/1965	City of Meridian v. Black	5234	S.D. Miss.	Meridian
3/9/1965	City of Indianola v. Brown	GCR6518	N.D. Miss.	Greenville
3/9/1965	City of Indianola v. Dann	GCR6519	N.D. Miss.	Greenville
3/9/1965	City of Indianola v. Harris	GCR6520	N.D. Miss.	Greenville
3/9/1965	City of Indianola v. Jenkins	GCR6521	N.D. Miss.	Greenville
3/9/1965	City of Indianola v. Kaminsky	GCR6522	N.D. Miss.	Greenville
3/9/1965	City of Indianola v. Mack	GCR6523	N.D. Miss.	Greenville
3/9/1965	City of Indianola v. Mack	GCR6524	N.D. Miss.	Greenville
3/9/1965	City of Indianola v. Scattergood	GCR6525	N.D. Miss.	Greenville
3/9/1965	City of Indianola v. Brown	GCR6526	N.D. Miss.	Greenville
3/9/1965	City of Indianola v. Dann	GCR6527	N.D. Miss.	Greenville
3/9/1965	City of Indianola v. Goree	GCR6528	N.D. Miss.	Greenville
3/9/1965	City of Indianola v. Jenkins	GCR6529	N.D. Miss.	Greenville
3/9/1965	City of Indianola v. Kaminsky	GCR6530	N.D. Miss.	Greenville
3/9/1965	City of Indianola v. Mack	GCR6531	N.D. Miss.	Greenville
3/9/1965	City of Indianola v. Cooper	GCR6532	N.D. Miss.	Greenville
3/9/1965	City of Indianola v. Giles	GCR6533	N.D. Miss.	Greenville
3/9/1965	City of Indianola v. Jones	GCR6534	N.D. Miss.	Greenville

<i>Removed</i>	<i>Case Name</i>	<i>Docket No.</i>	<i>District</i>	<i>Division</i>
3/9/1965	City of Indianola v. Stanford	GCR6535	N.D. Miss.	Greenville
3/9/1965	City of Indianola v. Tyler	GCR6536	N.D. Miss.	Greenville
3/9/1965	City of Indianola v. Herman	GCR6537	N.D. Miss.	Greenville
3/9/1965	City of Indianola v. Gerald	GCR6538	N.D. Miss.	Greenville
3/9/1965	City of Indianola v. Campbell	GCR6539	N.D. Miss.	Greenville
3/9/1965	City of Indianola v. Johnson	GCR6540	N.D. Miss.	Greenville
3/9/1965	City of Indianola v. Day	GCR6541	N.D. Miss.	Greenville
3/9/1965	City of Indianola v. Mathews	GCR6542	N.D. Miss.	Greenville
3/9/1965	City of Indianola v. Plummer	GCR6543	N.D. Miss.	Greenville
3/9/1965	City of Indianola v. Weeks	GCR6544	N.D. Miss.	Greenville
3/9/1965	City of Indianola v. Cole	GCR6545	N.D. Miss.	Greenville
3/9/1965	City of Indianola v. Howard	GCR6546	N.D. Miss.	Greenville
3/9/1965	City of Indianola v. Bowie	GCR6547	N.D. Miss.	Greenville
3/9/1965	City of Indianola v. Brownlow	GCR6548	N.D. Miss.	Greenville
3/9/1965	City of Indianola v. Gerald	GCR6549	N.D. Miss.	Greenville
3/9/1965	City of Indianola v. Smith	GCR6550	N.D. Miss.	Greenville
3/9/1965	City of Indianola v. Williams	GCR6551	N.D. Miss.	Greenville
3/9/1965	City of Indianola v. Branigan	GCR6552	N.D. Miss.	Greenville
3/9/1965	City of Indianola v. White	GCR6553	N.D. Miss.	Greenville
3/9/1965	City of Indianola v. Jenkins	GCR6554	N.D. Miss.	Greenville
3/9/1965	City of Indianola v. Porter	GCR6555	N.D. Miss.	Greenville
3/9/1965	City of Indianola v. Harris	GCR6556	N.D. Miss.	Greenville
3/9/1965	City of Indianola v. King	GCR6557	N.D. Miss.	Greenville
3/9/1965	City of Indianola v. Nolen	GCR6558	N.D. Miss.	Greenville
3/9/1965	City of Indianola v. Leonard	GCR6559	N.D. Miss.	Greenville
3/9/1965	City of Indianola v. Scattergood	GCR6560	N.D. Miss.	Greenville
3/9/1965	City of Indianola v. Rice	GCR6561	N.D. Miss.	Greenville
3/9/1965	City of Indianola v. Harris	GCR6562	N.D. Miss.	Greenville
3/9/1965	City of Indianola v. Newell	GCR6563	N.D. Miss.	Greenville
3/9/1965	City of Indianola v. Scattergood	GCR6564	N.D. Miss.	Greenville
3/9/1965	City of Indianola v. Washington	GCR6565	N.D. Miss.	Greenville
3/9/1965	City of Indianola v. Flemming	GCR6566	N.D. Miss.	Greenville
3/9/1965	City of Indianola v. Drain	GCR6567	N.D. Miss.	Greenville
3/9/1965	City of Indianola v. Parker	GCR6568	N.D. Miss.	Greenville
3/9/1965	City of Indianola v. Rome	GCR6569	N.D. Miss.	Greenville
3/9/1965	City of Indianola v. Smith	GCR6570	N.D. Miss.	Greenville
3/9/1965	City of Indianola v. Humpries	GCR6571	N.D. Miss.	Greenville
3/9/1965	City of Indianola v. Rome	GCR6572	N.D. Miss.	Greenville
3/9/1965	City of Indianola v. Blakely	GCR6573	N.D. Miss.	Greenville
3/9/1965	City of Indianola v. Parker	GCR6574	N.D. Miss.	Greenville
3/9/1965	City of Indianola v. Williams	GCR6575	N.D. Miss.	Greenville
3/9/1965	City of Indianola v. Sims	GCR6576	N.D. Miss.	Greenville

<i>Removed</i>	<i>Case Name</i>	<i>Docket No.</i>	<i>District</i>	<i>Division</i>
3/9/1965	City of Indianola v. Wilson	GCR6577	N.D. Miss.	Greenville
3/9/1965	City of Indianola v. Phillips	GCR6578	N.D. Miss.	Greenville
3/9/1965	City of Indianola v. Clark	GCR6579	N.D. Miss.	Greenville
3/9/1965	City of Indianola v. McClain	GCR6580	N.D. Miss.	Greenville
3/9/1965	City of Indianola v. McCarthy	GCR6581	N.D. Miss.	Greenville
3/9/1965	City of Indianola v. Phelps	GCR6582	N.D. Miss.	Greenville
3/9/1965	City of Indianola v. Branigan	GCR6583	N.D. Miss.	Greenville
3/9/1965	City of Indianola v. Myles	GCR6584	N.D. Miss.	Greenville
3/9/1965	City of Indianola v. Denton	GCR6585	N.D. Miss.	Greenville
3/9/1965	City of Indianola v. Sims	GCR6586	N.D. Miss.	Greenville
3/9/1965	City of Indianola v. Hatchett	GCR6587	N.D. Miss.	Greenville
3/9/1965	City of Indianola v. Nixon	GCR6588	N.D. Miss.	Greenville
3/9/1965	City of Indianola v. Rice	GCR6589	N.D. Miss.	Greenville
3/9/1965	City of Indianola v. Brown	GCR6590	N.D. Miss.	Greenville
3/9/1965	City of Indianola v. Wilson	GCR6591	N.D. Miss.	Greenville
3/9/1965	City of Indianola v. Sanders	GCR6592	N.D. Miss.	Greenville
3/9/1965	City of Indianola v. Jones	GCR6593	N.D. Miss.	Greenville
3/9/1965	City of Indianola v. McClain	GCR6594	N.D. Miss.	Greenville
3/9/1965	City of Indianola v. Winston	GCR6595	N.D. Miss.	Greenville
3/9/1965	City of Indianola v. Clay	GCR6596	N.D. Miss.	Greenville
3/9/1965	City of Indianola v. Wilson	GCR6597	N.D. Miss.	Greenville
3/11/1965	City of Marks v. Goodner	DCR6515	N.D. Miss.	Clarksdale
3/11/1965	City of Marks v. Bateman	DCR6516	N.D. Miss.	Clarksdale
3/12/1965	City of Batesville v. O'Connor	DCR6517	N.D. Miss.	Clarksdale
3/12/1965	City of Batesville v. Williams	DCR6518	N.D. Miss.	Clarksdale
3/12/1965	City of Batesville v. Braxton	DCR6519	N.D. Miss.	Clarksdale
3/12/1965	City of Batesville v. Johnson	DCR6520	N.D. Miss.	Clarksdale
3/12/1965	City of Batesville v. Cathey	DCR6521	N.D. Miss.	Clarksdale
3/12/1965	City of Batesville v. Eskridge	DCR6522	N.D. Miss.	Clarksdale
3/12/1965	City of Batesville v. Donner	DCR6523	N.D. Miss.	Clarksdale
3/12/1965	City of Batesville v. Lee	DCR6524	N.D. Miss.	Clarksdale
3/12/1965	City of Batesville v. Webb	DCR6525	N.D. Miss.	Clarksdale
3/12/1965	City of Batesville v. Johnson	DCR6526	N.D. Miss.	Clarksdale
3/12/1965	City of Batesville v. Jackson	DCR6527	N.D. Miss.	Clarksdale
3/12/1965	City of Batesville v. Jackson	DCR6528	N.D. Miss.	Clarksdale
3/12/1965	City of Indianola v. Seese	GCR6598	N.D. Miss.	Greenville
3/12/1965	City of Indianola v. Kaminsky	GCR6599	N.D. Miss.	Greenville
3/12/1965	City of Indianola v. Scattergood	GCR65100	N.D. Miss.	Greenville
3/12/1965	City of Indianola v. Smith	GCR65101	N.D. Miss.	Greenville
3/12/1965	City of Indianola v. Dann	GCR65102	N.D. Miss.	Greenville
3/12/1965	City of Indianola v. Davis	GCR65103	N.D. Miss.	Greenville
3/15/1965	Mississippi v. Larsen	8497	S.D. Miss.	Biloxi

<i>Removed</i>	<i>Case Name</i>	<i>Docket No.</i>	<i>District</i>	<i>Division</i>
3/15/1965	Mississippi v. Montgomery	8498	S.D. Miss.	Biloxi
3/15/1965	Mississippi v. Sours	8499	S.D. Miss.	Biloxi
3/15/1965	Mississippi v. Simmon	8500	S.D. Miss.	Biloxi
3/15/1965	Mississippi v. Shanahan	8501	S.D. Miss.	Biloxi
3/15/1965	Mississippi v. Liddell	8502	S.D. Miss.	Biloxi
3/15/1965	Mississippi v. Liddell	8503	S.D. Miss.	Biloxi
3/15/1965	Mississippi v. Parker	8504	S.D. Miss.	Biloxi
3/15/1965	Mississippi v. Simmon	8505	S.D. Miss.	Biloxi
3/15/1965	Mississippi v. Kelly	8506	S.D. Miss.	Biloxi
3/15/1965	Mississippi v. Flowers	8507	S.D. Miss.	Biloxi
3/15/1965	Mississippi v. Liddell	8508	S.D. Miss.	Biloxi
3/15/1965	Mississippi v. McCoveroy	8509	S.D. Miss.	Biloxi
3/15/1965	Mississippi v. Montgomery	8510	S.D. Miss.	Biloxi
3/15/1965	Mississippi v. Montgomery	8511	S.D. Miss.	Biloxi
3/15/1965	Mississippi v. Jackson	8512	S.D. Miss.	Biloxi
3/15/1965	Mississippi v. Grant	8513	S.D. Miss.	Biloxi
3/15/1965	Mississippi v. Martin	8514	S.D. Miss.	Biloxi
3/15/1965	Mississippi v. Sellers	8515	S.D. Miss.	Biloxi
3/15/1965	Mississippi v. Sellers	8516	S.D. Miss.	Biloxi
3/15/1965	Mississippi v. David	8517	S.D. Miss.	Biloxi
3/15/1965	Mississippi v. Agenew	8518	S.D. Miss.	Biloxi
3/15/1965	Mississippi v. Colley	8519	S.D. Miss.	Biloxi
3/15/1965	Mississippi v. Kelly	8520	S.D. Miss.	Biloxi
3/15/1965	Mississippi v. Bass	8521	S.D. Miss.	Biloxi
3/15/1965	Mississippi v. Grandison	8522	S.D. Miss.	Biloxi
3/22/1965	City of Marks v. Sigel	DCR6530	N.D. Miss.	Clarksdale
3/25/1965	Mississippi v. Davis	4405	S.D. Miss.	Vicksburg
3/25/1965	Mississippi v. Hansen	4406	S.D. Miss.	Vicksburg
3/25/1965	Mississippi v. Easton	4407	S.D. Miss.	Vicksburg
3/25/1965	Mississippi v. Jammont	4408	S.D. Miss.	Vicksburg
3/25/1965	Mississippi v. Bell	4409	S.D. Miss.	Vicksburg
3/25/1965	Mississippi v. Fitzgerald	4410	S.D. Miss.	Vicksburg
3/25/1965	Mississippi v. Green	4411	S.D. Miss.	Vicksburg
3/25/1965	Mississippi v. Martin	4412	S.D. Miss.	Vicksburg
3/29/1965	City of Vicksburg v. Dunlap	4413	S.D. Miss.	Vicksburg
3/29/1965	City of Vicksburg v. Dunlap	4414	S.D. Miss.	Vicksburg
3/29/1965	City of Vicksburg v. Green	4415	S.D. Miss.	Vicksburg
3/29/1965	City of Vicksburg v. Lerner	4416	S.D. Miss.	Vicksburg
3/29/1965	City of Vicksburg v. Washington	4417	S.D. Miss.	Vicksburg
3/29/1965	City of Vicksburg v. Lucero	4418	S.D. Miss.	Vicksburg
3/29/1965	City of Vicksburg v. Ellis	4419	S.D. Miss.	Vicksburg
3/31/1965	City of Greenville v. Novick	GCR65104	N.D. Miss.	Greenville

<i>Removed</i>	<i>Case Name</i>	<i>Docket No.</i>	<i>District</i>	<i>Division</i>
3/31/1965	City of Greenville v. Bynum	GCR65105	N.D. Miss.	Greenville
3/31/1965	City of Greenville v. Bynum	GCR65106	N.D. Miss.	Greenville
3/31/1965	City of Greenville v. Chisolm	GCR65107	N.D. Miss.	Greenville
3/31/1965	City of Greenville v. Chisolm	GCR65108	N.D. Miss.	Greenville
3/31/1965	City of Greenville v. Chisolm	GCR65109	N.D. Miss.	Greenville
3/31/1965	City of Greenville v. Chisolm	GCR65110	N.D. Miss.	Greenville
3/31/1965	City of Greenville v. Quinn	GCR65111	N.D. Miss.	Greenville
3/31/1965	City of Greenville v. Quinn	GCR65112	N.D. Miss.	Greenville
3/31/1965	City of Greenville v. Gibson	GCR65113	N.D. Miss.	Greenville
3/31/1965	City of Greenville v. Johnson	GCR65114	N.D. Miss.	Greenville
3/31/1965	City of Greenville v. Howard	GCR65115	N.D. Miss.	Greenville
3/31/1965	City of Greenville v. Morton	GCR65116	N.D. Miss.	Greenville
3/31/1965	City of Greenville v. Jackson	GCR65117	N.D. Miss.	Greenville
3/31/1965	City of Greenville v. Peterson	GCR65118	N.D. Miss.	Greenville
3/31/1965	City of Greenville v. Banks	GCR65119	N.D. Miss.	Greenville
3/31/1965	City of Greenville v. Dixon	GCR65120	N.D. Miss.	Greenville
3/31/1965	City of Greenville v. Tyler	GCR65121	N.D. Miss.	Greenville
3/31/1965	City of Greenville v. Mitchell	GCR65122	N.D. Miss.	Greenville
3/31/1965	City of Greenville v. Watkins	GCR65123	N.D. Miss.	Greenville
3/31/1965	City of Greenville v. Walker	GCR65124	N.D. Miss.	Greenville
3/31/1965	City of Greenville v. Chandler	GCR65125	N.D. Miss.	Greenville
3/31/1965	City of Greenville v. Packard	GCR65126	N.D. Miss.	Greenville
3/31/1965	City of Greenville v. Vail	GCR65127	N.D. Miss.	Greenville
3/31/1965	City of Greenville v. McNeill	GCR65128	N.D. Miss.	Greenville
3/31/1965	City of Greenville v. Walker	GCR65129	N.D. Miss.	Greenville
3/31/1965	City of Greenville v. Smith	GCR65130	N.D. Miss.	Greenville
3/31/1965	City of Greenville v. Allen	GCR65131	N.D. Miss.	Greenville
3/31/1965	City of Greenville v. Farrar	GCR65132	N.D. Miss.	Greenville
3/31/1965	City of Greenville v. Rollins	GCR65133	N.D. Miss.	Greenville
4/6/1965	City of Indianola v. Cableton	GCR65134	N.D. Miss.	Greenville
4/9/1965	Mississippi v. Bateman	DCR6533	N.D. Miss.	Clarksdale
4/9/1965	Mississippi v. Williams	DCR6534	N.D. Miss.	Clarksdale
4/9/1965	Mississippi v. Williams	DCR6535	N.D. Miss.	Clarksdale
4/12/1965	City of Batesville v. Webb	DCR6536	N.D. Miss.	Clarksdale
4/12/1965	City of Batesville v. Williams	DCR6537	N.D. Miss.	Clarksdale
4/12/1965	City of Batesville v. Lee	DCR6538	N.D. Miss.	Clarksdale
4/12/1965	City of Batesville v. Johnson	DCR6539	N.D. Miss.	Clarksdale
4/12/1965	City of Batesville v. Johnson	DCR6540	N.D. Miss.	Clarksdale
4/12/1965	City of Batesville v. Jackson	DCR6541	N.D. Miss.	Clarksdale
4/12/1965	City of Batesville v. Eskridge	DCR6542	N.D. Miss.	Clarksdale
4/12/1965	City of Batesville v. Donner	DCR6543	N.D. Miss.	Clarksdale
4/12/1965	City of Batesville v. Cathey	DCR6544	N.D. Miss.	Clarksdale

<i>Removed</i>	<i>Case Name</i>	<i>Docket No.</i>	<i>District</i>	<i>Division</i>
4/12/1965	City of Batesville v. Braxton	DCR6545	N.D. Miss.	Clarksdale
4/12/1965	City of Batesville v. O'Connor	DCR6546	N.D. Miss.	Clarksdale
4/12/1965	City of Batesville v. Jackson	DCR6547	N.D. Miss.	Clarksdale
4/16/1965	Mississippi v. Montgomery	3728	S.D. Miss.	Jackson
4/16/1965	Mississippi v. Montgomery	3729	S.D. Miss.	Jackson
4/16/1965	Mississippi v. Montgomery	3730	S.D. Miss.	Jackson
4/19/1965	Mississippi v. Haggart	DCR6548	N.D. Miss.	Clarksdale
4/19/1965	Mississippi v. Ware	DCR6549	N.D. Miss.	Clarksdale
4/19/1965	Mississippi v. James	DCR6550	N.D. Miss.	Clarksdale
4/19/1965	Mississippi v. Jones	DCR6551	N.D. Miss.	Clarksdale
4/19/1965	Mississippi v. Ware	DCR6552	N.D. Miss.	Clarksdale
4/19/1965	Mississippi v. Turner	DCR6553	N.D. Miss.	Clarksdale
4/19/1965	Mississippi v. Mitchell	DCR6554	N.D. Miss.	Clarksdale
4/19/1965	Mississippi v. Thomas	DCR6555	N.D. Miss.	Clarksdale
4/19/1965	Mississippi v. Turner	DCR6556	N.D. Miss.	Clarksdale
4/19/1965	Mississippi v. Jakes	DCR6557	N.D. Miss.	Clarksdale
4/19/1965	Mississippi v. Hawkins	DCR6558	N.D. Miss.	Clarksdale
4/19/1965	Mississippi v. Hawkins	DCR6559	N.D. Miss.	Clarksdale
4/19/1965	Mississippi v. Jones	DCR6560	N.D. Miss.	Clarksdale
4/19/1965	Mississippi v. Greenwood	DCR6561	N.D. Miss.	Clarksdale
4/19/1965	Mississippi v. Hope	DCR6562	N.D. Miss.	Clarksdale
4/19/1965	Mississippi v. Riles	DCR6563	N.D. Miss.	Clarksdale
4/19/1965	Mississippi v. Turner	DCR6564	N.D. Miss.	Clarksdale
4/19/1965	Mississippi v. Collins	DCR6565	N.D. Miss.	Clarksdale
4/19/1965	Mississippi v. Collins	DCR6566	N.D. Miss.	Clarksdale
4/19/1965	Mississippi v. Mays	DCR6567	N.D. Miss.	Clarksdale
4/19/1965	Mississippi v. Fowler	DCR6568	N.D. Miss.	Clarksdale
4/19/1965	Mississippi v. Loston	DCR6569	N.D. Miss.	Clarksdale
4/19/1965	Mississippi v. Singleton	DCR6570	N.D. Miss.	Clarksdale
4/19/1965	Mississippi v. Griggs	DCR6571	N.D. Miss.	Clarksdale
4/19/1965	Mississippi v. Robinson	DCR6572	N.D. Miss.	Clarksdale
4/19/1965	Mississippi v. Thomas	DCR6573	N.D. Miss.	Clarksdale
4/19/1965	Mississippi v. Robinson	DCR6574	N.D. Miss.	Clarksdale
4/19/1965	Mississippi v. Curry	DCR6575	N.D. Miss.	Clarksdale
4/19/1965	Mississippi v. Williams	DCR6576	N.D. Miss.	Clarksdale
4/19/1965	Mississippi v. Rancher	DCR6577	N.D. Miss.	Clarksdale
4/19/1965	Mississippi v. Dunbar	DCR6578	N.D. Miss.	Clarksdale
4/19/1965	Mississippi v. Collins	DCR6579	N.D. Miss.	Clarksdale
4/19/1965	Mississippi v. Lott	DCR6580	N.D. Miss.	Clarksdale
4/19/1965	Mississippi v. Singleton	DCR6581	N.D. Miss.	Clarksdale
4/19/1965	Mississippi v. Jackson	DCR6582	N.D. Miss.	Clarksdale
4/19/1965	Mississippi v. Gellatly	DCR6583	N.D. Miss.	Clarksdale

<i>Removed</i>	<i>Case Name</i>	<i>Docket No.</i>	<i>District</i>	<i>Division</i>
4/19/1965	Mississippi v. Weil	DCR6584	N.D. Miss.	Clarksdale
4/19/1965	Mississippi v. James	DCR6585	N.D. Miss.	Clarksdale
4/19/1965	Mississippi v. Collins	DCR6586	N.D. Miss.	Clarksdale
4/19/1965	Mississippi v. Ware	DCR6587	N.D. Miss.	Clarksdale
4/19/1965	Mississippi v. Clayborn	DCR6588	N.D. Miss.	Clarksdale
4/19/1965	Mississippi v. Pratt	DCR6589	N.D. Miss.	Clarksdale
4/19/1965	Mississippi v. Smith	DCR6590	N.D. Miss.	Clarksdale
4/19/1965	Mississippi v. Chambers	DCR6591	N.D. Miss.	Clarksdale
4/19/1965	Mississippi v. Martin	DCR6592	N.D. Miss.	Clarksdale
4/19/1965	Mississippi v. Williams	DCR6593	N.D. Miss.	Clarksdale
4/19/1965	Mississippi v. Crawford	DCR6594	N.D. Miss.	Clarksdale
4/19/1965	Mississippi v. Lark	DCR6595	N.D. Miss.	Clarksdale
4/19/1965	Mississippi v. Clayborn	DCR6596	N.D. Miss.	Clarksdale
4/19/1965	Mississippi v. Shelton	DCR6597	N.D. Miss.	Clarksdale
4/19/1965	City of Moss Point v. Reeves	8528	S.D. Miss.	Biloxi
4/19/1965	City of Moss Point v. Sellers	8529	S.D. Miss.	Biloxi
4/19/1965	City of Moss Point v. McKeller	8530	S.D. Miss.	Biloxi
4/19/1965	City of Moss Point v. Larsen	8531	S.D. Miss.	Biloxi
4/19/1965	City of Moss Point v. Sours	8532	S.D. Miss.	Biloxi
4/19/1965	City of Moss Point v. Bass	8533	S.D. Miss.	Biloxi
4/23/1965	Mississippi v. Allen	3733	S.D. Miss.	Jackson
4/23/1965	Mississippi v. Brumfield	3734	S.D. Miss.	Jackson
4/23/1965	Mississippi v. Banks	3735	S.D. Miss.	Jackson
4/23/1965	Mississippi v. Vaughn	3736	S.D. Miss.	Jackson
4/23/1965	Mississippi v. Berry	3737	S.D. Miss.	Jackson
4/23/1965	Mississippi v. Martin	3738	S.D. Miss.	Jackson
4/23/1965	Mississippi v. Reed	3739	S.D. Miss.	Jackson
4/23/1965	Mississippi v. Gordon	3740	S.D. Miss.	Jackson
4/23/1965	Mississippi v. Martin	3741	S.D. Miss.	Jackson
4/23/1965	Mississippi v. Ellzey	3742	S.D. Miss.	Jackson
4/23/1965	Mississippi v. Martin	3743	S.D. Miss.	Jackson
4/23/1965	Mississippi v. Martin	3744	S.D. Miss.	Jackson
4/23/1965	Mississippi v. Vick	3745	S.D. Miss.	Jackson
4/23/1965	Mississippi v. Magee	3746	S.D. Miss.	Jackson
4/23/1965	Mississippi v. Eubanks	3747	S.D. Miss.	Jackson
4/23/1965	Mississippi v. Lyons	3748	S.D. Miss.	Jackson
4/23/1965	Mississippi v. Beacham	3749	S.D. Miss.	Jackson
4/23/1965	Mississippi v. Jackson	3750	S.D. Miss.	Jackson
4/23/1965	Mississippi v. Dillon	3751	S.D. Miss.	Jackson
4/23/1965	Mississippi v. Campbell	3752	S.D. Miss.	Jackson
4/23/1965	Mississippi v. Campbell	3753	S.D. Miss.	Jackson
4/23/1965	Mississippi v. Crossley	3754	S.D. Miss.	Jackson

<i>Removed</i>	<i>Case Name</i>	<i>Docket No.</i>	<i>District</i>	<i>Division</i>
4/23/1965	Mississippi v. Martin	3755	S.D. Miss.	Jackson
4/23/1965	Mississippi v. Travis	3756	S.D. Miss.	Jackson
4/23/1965	Mississippi v. Cook	3757	S.D. Miss.	Jackson
4/23/1965	Mississippi v. Lee	3758	S.D. Miss.	Jackson
4/23/1965	Mississippi v. Morgan	3759	S.D. Miss.	Jackson
4/23/1965	Mississippi v. Lea	3760	S.D. Miss.	Jackson
4/23/1965	Mississippi v. Beacham	3761	S.D. Miss.	Jackson
4/23/1965	Mississippi v. Martin	3762	S.D. Miss.	Jackson
4/23/1965	Mississippi v. Holmes	3763	S.D. Miss.	Jackson
4/23/1965	Mississippi v. Eubanks	3764	S.D. Miss.	Jackson
4/23/1965	Mississippi v. Joseph	3765	S.D. Miss.	Jackson
4/23/1965	Mississippi v. Reed	3766	S.D. Miss.	Jackson
4/23/1965	Mississippi v. Dillon	3767	S.D. Miss.	Jackson
4/23/1965	Mississippi v. Ledbetter	3768	S.D. Miss.	Jackson
4/23/1965	Mississippi v. Williams	3769	S.D. Miss.	Jackson
4/23/1965	Mississippi v. Quinn	3770	S.D. Miss.	Jackson
4/23/1965	Mississippi v. Martin	3771	S.D. Miss.	Jackson
4/23/1965	Mississippi v. Ward	3772	S.D. Miss.	Jackson
4/23/1965	Mississippi v. Williams	3773	S.D. Miss.	Jackson
4/23/1965	Mississippi v. Berry	3774	S.D. Miss.	Jackson
4/23/1965	Mississippi v. Givens	3775	S.D. Miss.	Jackson
4/23/1965	Mississippi v. Reed	3776	S.D. Miss.	Jackson
4/23/1965	Mississippi v. Woods	3777	S.D. Miss.	Jackson
4/23/1965	Mississippi v. Lea	3778	S.D. Miss.	Jackson
4/23/1965	Mississippi v. Crossley	3779	S.D. Miss.	Jackson
4/23/1965	Mississippi v. Ward	3780	S.D. Miss.	Jackson
4/23/1965	Mississippi v. Eubanks	3781	S.D. Miss.	Jackson
4/23/1965	Mississippi v. Banks	3782	S.D. Miss.	Jackson
4/23/1965	Mississippi v. Vaughn	3783	S.D. Miss.	Jackson
4/23/1965	Mississippi v. Quinn	3784	S.D. Miss.	Jackson
4/23/1965	Mississippi v. Quinn	3785	S.D. Miss.	Jackson
4/23/1965	Mississippi v. Gordon	3786	S.D. Miss.	Jackson
4/23/1965	Mississippi v. Coleman	3787	S.D. Miss.	Jackson
4/23/1965	Mississippi v. Johnson	3788	S.D. Miss.	Jackson
4/23/1965	Mississippi v. Lyons	3789	S.D. Miss.	Jackson
4/23/1965	Mississippi v. Vick	3790	S.D. Miss.	Jackson
4/23/1965	Mississippi v. Martin	3791	S.D. Miss.	Jackson
4/23/1965	Mississippi v. Ellzey	3792	S.D. Miss.	Jackson
4/23/1965	Mississippi v. Morgan	3793	S.D. Miss.	Jackson
4/23/1965	Mississippi v. Eubanks	3794	S.D. Miss.	Jackson
4/23/1965	Mississippi v. Martin	3795	S.D. Miss.	Jackson
4/23/1965	Mississippi v. Foster	3796	S.D. Miss.	Jackson

<i>Removed</i>	<i>Case Name</i>	<i>Docket No.</i>	<i>District</i>	<i>Division</i>
4/23/1965	Mississippi v. Brumfield	3797	S.D. Miss.	Jackson
4/23/1965	Mississippi v. Cook	3798	S.D. Miss.	Jackson
4/23/1965	Mississippi v. Quinn	3799	S.D. Miss.	Jackson
4/23/1965	Mississippi v. Harris	3800	S.D. Miss.	Jackson
4/23/1965	Mississippi v. Brown	3801	S.D. Miss.	Jackson
4/23/1965	Mississippi v. Hughes	3802	S.D. Miss.	Jackson
4/23/1965	Mississippi v. Bowie	3803	S.D. Miss.	Jackson
4/23/1965	Mississippi v. Jenkins	3804	S.D. Miss.	Jackson
4/23/1965	Mississippi v. Gantz	3805	S.D. Miss.	Jackson
4/23/1965	Mississippi v. Lee	3806	S.D. Miss.	Jackson
4/26/1965	City of Jackson v. Sumrall	3807	S.D. Miss.	Jackson
4/26/1965	City of Jackson v. Killingworth	3808	S.D. Miss.	Jackson
4/26/1965	City of Jackson v. Irving	3809	S.D. Miss.	Jackson
4/26/1965	City of Jackson v. McKenzie	3810	S.D. Miss.	Jackson
4/26/1965	City of Jackson v. Morgan	3811	S.D. Miss.	Jackson
4/26/1965	City of Jackson v. Miller	3812	S.D. Miss.	Jackson
4/26/1965	City of Jackson v. Marshall	3813	S.D. Miss.	Jackson
4/26/1965	City of Jackson v. Crowell	3814	S.D. Miss.	Jackson
4/26/1965	City of Jackson v. Killingworth	3815	S.D. Miss.	Jackson
4/26/1965	City of Jackson v. Smith	3816	S.D. Miss.	Jackson
4/26/1965	City of Jackson v. Hand	3817	S.D. Miss.	Jackson
4/26/1965	City of Jackson v. Black	3818	S.D. Miss.	Jackson
4/26/1965	Mississippi v. Johnson	3819	S.D. Miss.	Jackson
4/29/1965	City of Moorhead v. Allen	GCR65136	N.D. Miss.	Greenville
4/29/1965	City of Moorhead v. Scattergood	GCR65137	N.D. Miss.	Greenville
4/29/1965	City of Moorhead v. Strong	GCR65138	N.D. Miss.	Greenville
5/7/1965	City of Moorhead v. Scattergood	GCR65139	N.D. Miss.	Greenville
5/11/1965	City of Jackson v. Klein	3820	S.D. Miss.	Jackson
5/11/1965	City of Jackson v. Smith	3821	S.D. Miss.	Jackson
5/11/1965	City of Jackson v. Palmer	3822	S.D. Miss.	Jackson
5/11/1965	City of Jackson v. Brown	3823	S.D. Miss.	Jackson
5/11/1965	City of Jackson v. Brown	3824	S.D. Miss.	Jackson
6/4/1965	City of Natchez v. Day	4421	S.D. Miss.	Vicksburg
6/4/1965	City of Natchez v. Henry	4422	S.D. Miss.	Vicksburg
6/4/1965	City of Natchez v. Thompson	4423	S.D. Miss.	Vicksburg
6/4/1965	City of Natchez v. Campbell	4424	S.D. Miss.	Vicksburg
6/4/1965	City of Natchez v. Shannon	4425	S.D. Miss.	Vicksburg
6/4/1965	City of Natchez v. Shannon	4426	S.D. Miss.	Vicksburg
6/4/1965	City of Natchez v. Leonard	4427	S.D. Miss.	Vicksburg
6/4/1965	City of Natchez v. Muilenberg	4428	S.D. Miss.	Vicksburg
6/4/1965	City of Natchez v. Tucker	4429	S.D. Miss.	Vicksburg
6/4/1965	City of Natchez v. Williams	4430	S.D. Miss.	Vicksburg

<i>Removed</i>	<i>Case Name</i>	<i>Docket No.</i>	<i>District</i>	<i>Division</i>
6/4/1965	City of Natchez v. Clay	4431	S.D. Miss.	Vicksburg
6/4/1965	City of Natchez v. Easton	4432	S.D. Miss.	Vicksburg
6/4/1965	City of Natchez v. Watkins	4433	S.D. Miss.	Vicksburg
6/4/1965	City of Natchez v. Shannon	4434	S.D. Miss.	Vicksburg
6/4/1965	City of Natchez v. Knight	4435	S.D. Miss.	Vicksburg
6/4/1965	City of Natchez v. Chapman	4436	S.D. Miss.	Vicksburg
6/4/1965	City of Natchez v. Morris	4437	S.D. Miss.	Vicksburg
6/4/1965	City of Natchez v. Bridgewater	4438	S.D. Miss.	Vicksburg
6/4/1965	City of Natchez v. Boswell	4439	S.D. Miss.	Vicksburg
6/4/1965	City of Natchez v. Parker	4440	S.D. Miss.	Vicksburg
6/4/1965	City of Natchez v. Knight	4441	S.D. Miss.	Vicksburg
6/4/1965	City of Natchez v. Ellis	4442	S.D. Miss.	Vicksburg
6/4/1965	City of Natchez v. McFarland	4443	S.D. Miss.	Vicksburg
6/4/1965	City of Natchez v. Monroe	4444	S.D. Miss.	Vicksburg
6/4/1965	City of Natchez v. Lee	4445	S.D. Miss.	Vicksburg
6/4/1965	City of Natchez v. Fitzgerald	4446	S.D. Miss.	Vicksburg
6/4/1965	City of Natchez v. Ellis	4447	S.D. Miss.	Vicksburg
6/4/1965	City of Natchez v. Shannon	4448	S.D. Miss.	Vicksburg
6/4/1965	City of Natchez v. Wilson	4449	S.D. Miss.	Vicksburg
6/4/1965	City of Natchez v. Fleming	4450	S.D. Miss.	Vicksburg
6/8/1965	City of Jackson v. Weiss	3832	S.D. Miss.	Jackson
6/8/1965	Mississippi v. Divans	3833	S.D. Miss.	Jackson
6/8/1965	Mississippi v. Scott	3834	S.D. Miss.	Jackson
6/8/1965	Mississippi v. Scott	3835	S.D. Miss.	Jackson
6/8/1965	Mississippi v. Smith	3836	S.D. Miss.	Jackson
6/8/1965	Mississippi v. Sweeney	3837	S.D. Miss.	Jackson
6/8/1965	Mississippi v. Lewis	3838	S.D. Miss.	Jackson
6/8/1965	Mississippi v. Jenkins	3839	S.D. Miss.	Jackson
6/8/1965	Mississippi v. Allen	3840	S.D. Miss.	Jackson
6/8/1965	Mississippi v. Pate	3841	S.D. Miss.	Jackson
6/8/1965	Mississippi v. Junk	3842	S.D. Miss.	Jackson
6/11/1965	Mississippi v. Scudder	WCR6522	N.D. Miss.	Oxford
6/11/1965	Mississippi v. Frye	WCR6523	N.D. Miss.	Oxford
6/24/1965	Mississippi v. Miles	DCR65102	N.D. Miss.	Clarksdale
6/25/1965	Mississippi v. McGee	DCR65103	N.D. Miss.	Clarksdale
6/25/1965	Mississippi v. King	DCR65104	N.D. Miss.	Clarksdale
6/25/1965	Mississippi v. King	DCR65105	N.D. Miss.	Clarksdale
7/6/1965	Mississippi v. Carver	DCR65109	N.D. Miss.	Clarksdale
7/6/1965	Mississippi v. Kemp	DCR65110	N.D. Miss.	Clarksdale
7/12/1965	Mississippi v. Bass	3849	S.D. Miss.	Jackson
7/12/1965	Mississippi v. Wilcox	3850	S.D. Miss.	Jackson
7/12/1965	Mississippi v. Klein	3851	S.D. Miss.	Jackson

<i>Removed</i>	<i>Case Name</i>	<i>Docket No.</i>	<i>District</i>	<i>Division</i>
7/20/1965	Mississippi v. Archie	3852	S.D. Miss.	Jackson
8/2/1965	Mississippi v. De Rienzi	GCR65148	N.D. Miss.	Greenville
8/11/1965	Mississippi v. Blackman	GCR65149	N.D. Miss.	Greenville
8/11/1965	Town of Drew v. Davis	GCR65150	N.D. Miss.	Greenville
8/19/1965	Mississippi v. Feinglass	WCR6531	N.D. Miss.	Oxford
8/19/1965	Mississippi v. Brown	DCR65127	N.D. Miss.	Clarksdale
8/19/1965	City of Indianola v. Brown	GCR65151	N.D. Miss.	Greenville
8/25/1965	Mississippi v. Ramsland	8540	S.D. Miss.	Biloxi
8/25/1965	Mississippi v. Karpe	8541	S.D. Miss.	Biloxi
8/25/1965	Mississippi v. Karpe	8542	S.D. Miss.	Biloxi
8/25/1965	Mississippi v. Bass	8543	S.D. Miss.	Biloxi
8/25/1965	Mississippi v. Bass	8544	S.D. Miss.	Biloxi
8/25/1965	Mississippi v. Ramsland	8545	S.D. Miss.	Biloxi
8/26/1965	Mississippi v. Chinn	3868	S.D. Miss.	Jackson
8/27/1965	Mississippi v. Brown	3869	S.D. Miss.	Jackson
8/31/1965	City of Natchez v. Easton	4451	S.D. Miss.	Vicksburg
9/3/1965	Mississippi v. Barber	3870	S.D. Miss.	Jackson
9/3/1965	Mississippi v. Levy	5237	S.D. Miss.	Meridian
9/3/1965	Mississippi v. Morse	5238	S.D. Miss.	Meridian
9/3/1965	Mississippi v. Morse	5239	S.D. Miss.	Meridian
9/3/1965	Mississippi v. Halprin	ECR6565	N.D. Miss.	Aberdeen
9/13/1965	City of Natchez v. Black	4452	S.D. Miss.	Vicksburg
9/15/1965	City of Drew v. Mack	GCR65153	N.D. Miss.	Greenville
9/16/1965	City of Natchez v. Roddy	4453	S.D. Miss.	Vicksburg
9/16/1965	City of Natchez v. Jackson	4454	S.D. Miss.	Vicksburg
9/17/1965	Mississippi v. Cummings	3871	S.D. Miss.	Jackson
9/23/1965	City of Holly Springs v. Jelinek	WCR6533	N.D. Miss.	Oxford
9/23/1965	City of Holly Springs v. Walker	WCR6534	N.D. Miss.	Oxford
9/23/1965	City of Holly Springs v. Kuenzli	WCR6535	N.D. Miss.	Oxford
9/23/1965	Mississippi v. Kuenzli	WCR6536	N.D. Miss.	Oxford
9/23/1965	City of Holly Springs v. Harvey	WCR6537	N.D. Miss.	Oxford
9/28/1965	Mississippi v. Cotton	DCR65131	N.D. Miss.	Clarksdale
9/29/1965	Mississippi v. Good	ECR6567	N.D. Miss.	Aberdeen
10/8/1965	City of Natchez v. Burns	4455	S.D. Miss.	Vicksburg
10/8/1965	City of Natchez v. Stone	4456	S.D. Miss.	Vicksburg
10/8/1965	City of Ashland v. Beckley	WCR6538	N.D. Miss.	Oxford
10/20/1965	Mississippi v. Bromberg	3874	S.D. Miss.	Jackson
10/20/1965	Mississippi v. Raymond	3875	S.D. Miss.	Jackson
10/20/1965	Mississippi v. Durham	3876	S.D. Miss.	Jackson
10/20/1965	Mississippi v. Hoover	3877	S.D. Miss.	Jackson
10/20/1965	Mississippi v. Howze	3878	S.D. Miss.	Jackson
10/20/1965	Mississippi v. Howze	3879	S.D. Miss.	Jackson

<i>Removed</i>	<i>Case Name</i>	<i>Docket No.</i>	<i>District</i>	<i>Division</i>
10/25/1965	City of Jackson v. Ross	3880	S.D. Miss.	Jackson
10/28/1965	City of Natchez v. Goodman	4457	S.D. Miss.	Vicksburg
10/28/1965	Mississippi v. Green	4458	S.D. Miss.	Vicksburg
11/3/1965	Mississippi v. Bartley	DCR65132	N.D. Miss.	Clarksdale
11/8/1965	Mississippi v. Barber	3881	S.D. Miss.	Jackson
11/8/1965	Mississippi v. Baldwin	4459	S.D. Miss.	Vicksburg
11/8/1965	Mississippi v. McFarland	4460	S.D. Miss.	Vicksburg
11/8/1965	City of Natchez v. Shields	4461	S.D. Miss.	Vicksburg
11/8/1965	Mississippi v. Stampley	4462	S.D. Miss.	Vicksburg
11/22/1965	Mississippi v. Chrisfield	4463	S.D. Miss.	Vicksburg
11/22/1965	Mississippi v. Smith	5240	S.D. Miss.	Meridian
11/22/1965	Mississippi v. Sumrall	5241	S.D. Miss.	Meridian
11/23/1965	Mississippi v. Glover	3883	S.D. Miss.	Jackson
11/23/1965	Mississippi v. Bumgarner	DCR65137	N.D. Miss.	Clarksdale
11/26/1965	Mississippi v. Sours	5242	S.D. Miss.	Meridian
11/26/1965	Mississippi v. Harris	5243	S.D. Miss.	Meridian
12/1/1965	City of Natchez v. Murray	4464	S.D. Miss.	Vicksburg
12/23/1965	Natchez Jitney Jungle v. NAACP	4467	S.D. Miss.	Vicksburg
12/27/1965	Mississippi v. Lopez	3911	S.D. Miss.	Jackson
12/27/1965	Town of Carthage v. Lewis	3912	S.D. Miss.	Jackson
12/29/1965	City of Cleveland v. Davis	DCR65142	N.D. Miss.	Clarksdale
1/3/1966	City of Canton v. Chinn	3913	S.D. Miss.	Jackson
1/3/1966	City of Canton v. Chinn	3914	S.D. Miss.	Jackson
1/3/1966	City of Canton v. Craft	3915	S.D. Miss.	Jackson
1/3/1966	City of Canton v. Chinn	3916	S.D. Miss.	Jackson
1/4/1966	Mississippi v. Martin	3917	S.D. Miss.	Jackson
1/7/1966	Mississippi v. Hamer	3918	S.D. Miss.	Jackson
1/17/1966	Mississippi v. Grupper	1393	S.D. Miss.	Hattiesburg
1/17/1966	Mississippi v. McClendon	1394	S.D. Miss.	Hattiesburg
1/17/1966	Mississippi v. Styles	1395	S.D. Miss.	Hattiesburg
1/27/1966	Mississippi v. Howard	4468	S.D. Miss.	Vicksburg
3/11/1966	Mississippi v. Thomas	3928	S.D. Miss.	Jackson
3/11/1966	Mississippi v. Herzenburg	3929	S.D. Miss.	Jackson
3/11/1966	Mississippi v. Brown	3930	S.D. Miss.	Jackson
3/11/1966	Mississippi v. Rogne	3931	S.D. Miss.	Jackson
3/11/1966	Mississippi v. Thurow	3932	S.D. Miss.	Jackson
3/29/1966	City of Holly Springs v. McGee	WCR667	N.D. Miss.	Oxford
4/6/1966	Mississippi v. Rogers	3936	S.D. Miss.	Jackson
4/11/1966	Mississippi v. Faucette	3937	S.D. Miss.	Jackson
4/14/1966	Mississippi v. Wright	WCR669	N.D. Miss.	Oxford
4/14/1966	Mississippi v. Wright	WCR6610	N.D. Miss.	Oxford
4/14/1966	Mississippi v. Wright	WCR6611	N.D. Miss.	Oxford

<i>Removed</i>	<i>Case Name</i>	<i>Docket No.</i>	<i>District</i>	<i>Division</i>
4/21/1966	Mississippi v. Gordon	3941	S.D. Miss.	Jackson
4/21/1966	Mississippi v. Howze	3942	S.D. Miss.	Jackson
4/26/1966	Mississippi v. Richmond	ECR6627	N.D. Miss.	Aberdeen
5/4/1966	City of West Point v. Amous	ECR6632	N.D. Miss.	Aberdeen
5/4/1966	City of West Point v. Bell	ECR6633	N.D. Miss.	Aberdeen
5/5/1966	Mississippi v. Frenz	5263	S.D. Miss.	Meridian
5/5/1966	Mississippi v. Frenz	5264	S.D. Miss.	Meridian
5/5/1966	Mississippi v. Frenz	5265	S.D. Miss.	Meridian
5/5/1966	Mississippi v. Boal	5266	S.D. Miss.	Meridian
5/11/1966	City of West Point v. Hampton	ECR6637	N.D. Miss.	Aberdeen
5/11/1966	City of West Point v. Lockard	ECR6638	N.D. Miss.	Aberdeen
5/11/1966	City of West Point v. Adams	ECR6639	N.D. Miss.	Aberdeen
5/11/1966	City of West Point v. McFarland	ECR6640	N.D. Miss.	Aberdeen
5/11/1966	City of West Point v. Wilson	ECR6641	N.D. Miss.	Aberdeen
5/11/1966	City of West Point v. Buffington	ECR6642	N.D. Miss.	Aberdeen
5/11/1966	City of West Point v. McGauley	ECR6643	N.D. Miss.	Aberdeen
5/11/1966	City of West Point v. Thomas	ECR6644	N.D. Miss.	Aberdeen
5/11/1966	City of West Point v. Brown	ECR6645	N.D. Miss.	Aberdeen
5/11/1966	City of West Point v. Thomas	ECR6646	N.D. Miss.	Aberdeen
5/11/1966	City of West Point v. Adkins	ECR6647	N.D. Miss.	Aberdeen
5/11/1966	City of West Point v. Henderson	ECR6648	N.D. Miss.	Aberdeen
5/11/1966	City of West Point v. Fowler	ECR6649	N.D. Miss.	Aberdeen
5/11/1966	City of West Point v. Fowler	ECR6650	N.D. Miss.	Aberdeen
5/11/1966	City of West Point v. Thomas	ECR6651	N.D. Miss.	Aberdeen
5/11/1966	City of West Point v. Thomas	ECR6652	N.D. Miss.	Aberdeen
5/11/1966	City of West Point v. Thomas	ECR6653	N.D. Miss.	Aberdeen
5/11/1966	City of West Point v. Thomas	ECR6654	N.D. Miss.	Aberdeen
5/11/1966	City of West Point v. Thomas	ECR6655	N.D. Miss.	Aberdeen
5/11/1966	City of West Point v. Buffington	ECR6656	N.D. Miss.	Aberdeen
5/19/1966	Town of Port Gibson v. Williams	4473	S.D. Miss.	Vicksburg
5/19/1966	Town of Port Gibson v. Trevillion	4474	S.D. Miss.	Vicksburg
5/20/1966	Mississippi v. Cohen	ECR6660	N.D. Miss.	Aberdeen
6/13/1966	Mississippi v. Miles	3947	S.D. Miss.	Jackson
6/13/1966	Mississippi v. Miles	3948	S.D. Miss.	Jackson
6/13/1966	Mississippi v. Miles	3949	S.D. Miss.	Jackson
6/13/1966	Mississippi v. Miles	3950	S.D. Miss.	Jackson
6/15/1966	Mississippi v. Bass	4476	S.D. Miss.	Vicksburg
8/19/1966	City of Grenada v. Nash	CRW6661	N.D. Miss.	Oxford
8/19/1966	City of Grenada v. Sims	CRW6662	N.D. Miss.	Oxford
8/19/1966	City of Grenada v. Durr	CRW6663	N.D. Miss.	Oxford
8/19/1966	City of Grenada v. Guess	CRW6664	N.D. Miss.	Oxford
8/19/1966	City of Grenada v. Gay	CRW6665	N.D. Miss.	Oxford

<i>Removed</i>	<i>Case Name</i>	<i>Docket No.</i>	<i>District</i>	<i>Division</i>
8/19/1966	City of Grenada v. Lee	CRW6666	N.D. Miss.	Oxford
8/19/1966	City of Grenada v. Willis	CRW6667	N.D. Miss.	Oxford
9/2/1966	City of Grenada v. Knott	CRW6669	N.D. Miss.	Oxford
9/2/1966	City of Grenada v. Sims	CRW6670	N.D. Miss.	Oxford
9/9/1966	City of Grenada v. Bolden	CRW6671	N.D. Miss.	Oxford
9/9/1966	Mississippi v. Cottonreader	CRW6672	N.D. Miss.	Oxford
9/15/1966	Mississippi v. Williamson	CRW6677	N.D. Miss.	Oxford
9/16/1966	Mississippi v. Frentz	CRE6678	N.D. Miss.	Aberdeen
9/16/1966	City of Kosciusko v. Frentz	CRE6679	N.D. Miss.	Aberdeen
9/19/1966	Mississippi v. Frentz	CRE6680	N.D. Miss.	Aberdeen
10/14/1966	City of Amory v. Smithhart	CRE66110	N.D. Miss.	Aberdeen
12/7/1966	Mississippi v. Jeffery	8669	S.D. Miss.	Biloxi
12/7/1966	Mississippi v. Stepp	8670	S.D. Miss.	Biloxi
1/6/1967	Mississippi v. Raymond	3998	S.D. Miss.	Jackson
2/1/1967	Mississippi v. Johnson	CRW6729	N.D. Miss.	Oxford
2/14/1967	Mississippi v. Maedke	CRG6734	N.D. Miss.	Greenville
7/13/1967	Mississippi v. Dodge	CRW6781	N.D. Miss.	Oxford
9/7/1967	City of Clarksdale v. Carter	CRD67130	N.D. Miss.	Clarksdale
11/17/1967	Mississippi v. Haberfeld	4072	S.D. Miss.	Jackson
11/17/1967	Mississippi v. Reiss	4073	S.D. Miss.	Jackson
12/5/1967	City of Cleveland v. McMath	CRD67156	N.D. Miss.	Clarksdale
9/5/1968	Mississippi v. Cottenreader	CRW68164	N.D. Miss.	Oxford
9/5/1968	Mississippi v. Pegues	CRW68165	N.D. Miss.	Oxford
9/5/1968	Mississippi v. Robinson	CRW68166	N.D. Miss.	Oxford
12/2/1968	Mississippi v. Ray	4161	S.D. Miss.	Jackson
12/2/1968	Mississippi v. Ray	4162	S.D. Miss.	Jackson
12/2/1968	Mississippi v. Ray	4163	S.D. Miss.	Jackson
12/9/1968	Mississippi v. Ray	4181	S.D. Miss.	Jackson
2/20/1969	Mississippi v. Redmond	CRW6926	N.D. Miss.	Oxford
2/20/1969	Mississippi v. Redmond	CRW6927	N.D. Miss.	Oxford
3/17/1969	City of Greenwood v. Evans	CRG6930	N.D. Miss.	Greenville
6/23/1969	City of Jackson v. Ross	4199	S.D. Miss.	Jackson
6/23/1969	City of Jackson v. Parker	4200	S.D. Miss.	Jackson
6/23/1969	City of Jackson v. Aschenbrenner	4201	S.D. Miss.	Jackson
7/8/1969	City of Tupelo v. Clayton	CRE6957	N.D. Miss.	Aberdeen
7/8/1969	City of Tupelo v. Underwood	CRE6958	N.D. Miss.	Aberdeen
7/8/1969	City of Tupelo v. Simmons	CRE6959	N.D. Miss.	Aberdeen
7/8/1969	City of Tupelo v. Lynk	CRE6960	N.D. Miss.	Aberdeen
7/8/1969	City of Tupelo v. Whitley	CRE6961	N.D. Miss.	Aberdeen
7/8/1969	City of Tupelo v. Gillespie	CRE6962	N.D. Miss.	Aberdeen
7/8/1969	City of Tupelo v. Rackley	CRE6963	N.D. Miss.	Aberdeen
7/8/1969	City of Tupelo v. Smothers	CRE6964	N.D. Miss.	Aberdeen

<i>Removed</i>	<i>Case Name</i>	<i>Docket No.</i>	<i>District</i>	<i>Division</i>
7/8/1969	City of Tupelo v. Easterling	CRE6965	N.D. Miss.	Aberdeen
7/22/1969	Mississippi v. Reaume	4204	S.D. Miss.	Jackson
7/22/1969	Mississippi v. Trest	4205	S.D. Miss.	Jackson
7/22/1969	Mississippi v. Trest	4206	S.D. Miss.	Jackson
7/22/1969	Mississippi v. Trest	4207	S.D. Miss.	Jackson
7/28/1969	Mississippi v. Gorenflo	4208	S.D. Miss.	Jackson
7/31/1969	Mississippi v. Smith	4211	S.D. Miss.	Jackson
7/31/1969	Mississippi v. Smith	4212	S.D. Miss.	Jackson
8/6/1969	Mississippi v. Reaume	4213	S.D. Miss.	Jackson
8/6/1969	Mississippi v. Reaume	4214	S.D. Miss.	Jackson
8/29/1969	Mississippi v. Reaume	4217	S.D. Miss.	Jackson
8/29/1969	Mississippi v. Reaume	4218	S.D. Miss.	Jackson
8/29/1969	Mississippi v. Smith	4219	S.D. Miss.	Jackson
8/29/1969	Mississippi v. Smith	4220	S.D. Miss.	Jackson
8/29/1969	Mississippi v. Smith	4221	S.D. Miss.	Jackson
9/4/1969	Mississippi v. Delaney	CRW6997	N.D. Miss.	Oxford
9/9/1969	Mississippi v. Davis	4223	S.D. Miss.	Jackson
9/24/1969	Mississippi v. Reaume	4225	S.D. Miss.	Jackson
9/25/1969	Mississippi v. Trest	4226	S.D. Miss.	Jackson
9/25/1969	Mississippi v. Trest	4227	S.D. Miss.	Jackson
9/25/1969	Mississippi v. Trest	4228	S.D. Miss.	Jackson
11/6/1969	Mississippi v. Harrington	4253	S.D. Miss.	Jackson
11/6/1969	Mississippi v. Harrington	4254	S.D. Miss.	Jackson
11/7/1969	Mississippi v. Clark	CRD69142	N.D. Miss.	Clarksdale
11/7/1969	Mississippi v. Clark	CRD69143	N.D. Miss.	Clarksdale
12/17/1969	Mississippi v. Alexander	4514	S.D. Miss.	Vicksburg
12/17/1969	Mississippi v. Willis	4515	S.D. Miss.	Vicksburg
12/23/1969	Mississippi v. Alexander	4516	S.D. Miss.	Vicksburg