

as well as Negro yet all white male teachers in Norfolk who hold the said the salary paid the plaintiff.

"14. White male high school teachers employed by defendants whose qualifications, certification, duties and services are the same as plaintiff's are being paid by defendants a minimum annual salary of Twelve Hundred (\$1200.00) Dollars.

"15. Plaintiff is being paid by the defendants for his services this school year as a regular male high school teacher as aforesaid an annual salary of Nine Hundred and Twenty-one (\$921.00) Dollars, being the amount fixed by defendants for Negro male high school teachers in their fifth year of teaching experience and solely because of the practice, usage and custom complained of in paragraph 11 of this complaint, and by the operation of the discriminatory salary schedule described in paragraphs 16 and 17 of this complaint the plaintiffs have been, are, and unless relief shall be granted by this Honorable Court as hereinafter prayed, will continue to be denied, solely by reason of race and color the opportunity to receive a higher salary equal to that paid to any white teachers similarly situated.

"16. Pursuant to the policy, custom and usage set out in paragraph 12 the defendants acting as agents and agencies of the Commonwealth of Virginia have established and maintained a salary schedule used by them to fix the amount of compensation for teachers and principals in the public schools of Norfolk which discriminates against plaintiffs solely because of their race or color. All teachers and principals in the public schools of Norfolk, including the plaintiffs, have been, are being and will continue to be paid by defendants pursuant to the following salary schedule adopted, maintained and being enforced by the defendants for the school year 1939-1940:

| <u>Negro</u> | <u>Salaries now being paid teachers new to the system.</u> | <u>Maximum salary being paid (affecting only those in system before increment plan was discontinued.)</u> |
|--------------------|--|---|
| Elementary | | |
| Normal Certificate | \$ 597.50 | \$ 960.10 |
| Degree | 611.00 | 960.00 |
| High School | | |
| Women | 699.00 | 1,105.20 |
| Men | 784.50 | 1,235.00 |