

*Veronica A. Davis*



Hampton, VA 23669

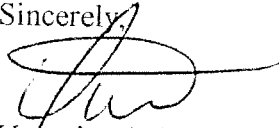
October 28, 2010

The Honorable Linda Batchelor-Smith, Clerk  
Hampton Circuit Court  
101 Kings Way Mall  
Hampton, Virginia 23669

Dear Ms. Batchelor-Smith:

Please accept for filing the enclosed Petition for a Prohibitory Injunction and the accompanying Order for the same.

I shall notify all defendants by Priority Mail.

Sincerely,  
  
Veronica A. Davis

LINDA BATCHELOR SMITH  
CLERK OF CIRCUIT COURT  
2010 OCT 28 AM 9:58  
BOOK# \_\_\_\_\_ PAGE# \_\_\_\_\_  
CITY OF HAMPTON, VA

**Certificate of Service**

I certify that I have sent Notice of the enclosed Petition and Order to all Defendants and, by *Priority Mail*, on this day, October 28, 2010.

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VIRGINIA: IN THE CIRCUIT COURT FOR THE CITY OF HAMPTON

PART 1

VERONICA A. DAVIS,  
~~101 Colebrook Drive~~  
Hampton, VA 23669  
Plaintiff,

vs.

FIVE PONDS PRESS,  
30 Hidden Spring Drive  
Westin, Conn 06883  
VIRGINIA DEPARTMENT OF EDUCATION,  
James Monroe Building  
101 N. 14<sup>th</sup> Street  
Richmond, VA 23219  
WILLIAMSBURG-JAMES CITY COUNTY PUBLIC SCHOOLS,  
101-D Mounts Bay Road  
Williamsburg, VA 23185  
Defendants

CL10-2094

PETITION FOR A PROHIBITORY INJUNCTION

THIS CAUSE came to be heard, on motion of Plaintiff, for an order enjoining Defendants from going forward with the revising of *Our World Virginia: Past and Present* to eliminate the existence of Black (African American) Confederate Soldiers for the following reasons:

1. Petitioner is likely to succeed in challenging the Five Ponds Press's decision to change the textbooks.

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The Petitioner is gathering research and witnesses that will support the fact of there being Black (African American) soldiers that served in the Confederate Army.

II. An injunction is necessary to provide Petitioner a meaningful opportunity to challenge allegations of there being no Black (African American) Confederates made by Carol Sheriff, parent of a child attending James City County Public Schools and to investigate the probability of Discrimination on each of the Defendants' behalf.

The Defendants did not establish a committee to investigate whether or not there was an error; they merely accepted the opinion of a Caucasian American parent who happens to be a professor of History at the College of William and Mary. The parent did not provide written proof to support that her opinion was a fact. In addition, the Defendants disregarded written research from notable African American Scholars and Confederate Organizations.

III. Petitioner and other African Americans will suffer irreparable harm if textbooks are changed.

An immediate stay is warranted because the Petitioner is currently seeking to restore a historic Cemetery where Black (African American) Confederates soldiers are (were) buried. The changing of the text without documented proof of there being no Black (African American) Confederate soldiers will diminished the significance of the burial grounds; there by

1 eliminating possible funding from Confederate  
2 organizations and historical designations from  
3 regional, state and federal government entities.

4  
5 The changing of the text also presents long and short  
6 term effects on the Plaintiff's children and other  
7 children who have studied the contributions of  
8 African Americans, for example diminished self-  
9 respect, anger, and increased feelings of  
10 worthlessness.

11  
12 IV. No Third parties will be unjustifiably harmed if the injunction is  
13 granted.

14 No one will be injured if this Court allows  
15 Petitioner to challenge the claim that the passage is  
16 erroneous. No one will be injured if this Court  
17 allows Petitioner to challenge the Defendants'  
18 decision to change the history books, because the  
19 State has already alerted local schools to  
20 temporarily adjust lessons and lectures.

21  
22 V. Granting Petitioner injunctive relief is the appropriate way to serve the  
23 public interest in this matter.

24 It is in the interests of all the parties, as  
25 well as the public, for this Court to stay the  
26 Defendants' decision to revise *Our World Virginia:  
27 Past and Present* textbook to eliminate the existence  
28 of Black (African American) Confederate Soldiers; in

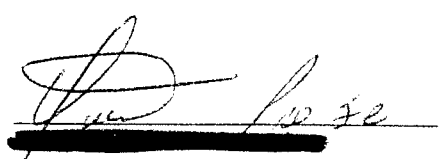
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that, there are African Americans that have proven  
that their family members were in fact enlisted  
confederate soldiers.

Because the Plaintiff, Veronica A. Davis and other African Americans,  
stand to suffer irreparable harm if the revision is made, and because, based on  
the fact recited, she will surely prevail in an action to determine the of  
existence of Black (African American) Confederate Soldiers, we ask that this  
Prohibitory Injunction Petition be granted, pursuant to Code of VA, section

I ask for a hearing, ex parte or otherwise, at the convenience of the  
courts.

Dated this October 28, 2010



Hampton, VA 23669  
Veronica A. Davis

LINDA PATTERSON SMITH  
CLERK OF CIRCUIT COURT  
2010 OCT 28 AM 10:02  
BOOK # \_\_\_\_\_ PAGE # \_\_\_\_\_  
CITY OF HAMPTON, VA

1 VIRGINIA: IN THE CIRCUIT COURT FOR THE CITY OF HAMPTON

2  
3 VERONICA A. DAVIS, )

4 [REDACTED] )  
5 Hampton, VA 23669 )

6 Plaintiff, )

7 vs. )

8 FIVE PONDS PRESS, )

9 30 Hidden Spring Drive )

10 Westin, Conn 06883 )

11 VIRGINIA DEPARTMENT OF EDUCATION, )

12 James Monroe Building )

13 101 N. 14<sup>th</sup> Street )

14 Richmond, VA 23219 )

15 WILLIAMSBURG-JAMES CITY COUNTY PUBLIC )

16 SCHOOLS, )

17 101-D Mounts Bay Road )

18 Williamsburg, VA 23185 )

19  
20 Defendants

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21  
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23 ORDER FOR PROHIBITORY INJUNCTION

24 THIS CAUSE came to be heard, on motion of Plaintiff, for an order  
25 enjoining the Defendants from going forward with rewriting the Virginia History  
26 Textbooks to exclude that there were African American (Black) Confederate  
27 Soldiers.

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AND IT APPEARING TO THE COURT that Plaintiff would suffer irreparable harm in the absence of such an injunction, and further, that Plaintiff is likely to prevail in (1) proving that the Defendants changing the text based on a third party's opinion and not documented facts that there were no Black (African American) Confederate Soldiers; and (2) provide documented research and witnesses that there were Black (African American) Confederate Soldiers.

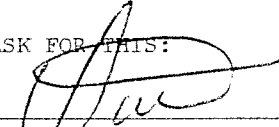
ORDERED, ADJUDGED, and DECREED that DEFENDANTS and their agents are enjoined from going forward with the aforesaid revising of Virginia History textbooks to eliminate the existence of Black (African American) Confederate Soldiers.

And this matter is continued for the further proceedings thereon.

ENTER THIS: \_\_\_\_\_ (date)

\_\_\_\_\_  
JUDGE

I ASK FOR THIS:

  
\_\_\_\_\_  
Veronica A. Davis, Plaintiff/Prose

SEEN:

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