

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

UNITED STATES OF AMERICA, by	)	
Ramsey Clark, Attorney General,	)	
	)	
Plaintiff,	)	
	)	
v.	)	CIVIL ACTION
	)	
	)	NO. C 67-575
INTERNATIONAL BROTHERHOOD OF	)	
ELECTRICAL WORKERS, LOCAL NO.	)	
38; ELECTRICAL JOINT APPREN-	)	
TICESHIP AND TRAINING COMMITTEE,	)	
	)	
Defendants.	)	
	)	

OBJECTIONS OF THE UNITED STATES
TO THE INTERROGATORIES OF THE
DEFENDANTS

The United States respectfully interposes its objection to Interrogatory 27 which was one of a set of interrogatories served by the defendants under Rule 33 of Federal Rules of Civil Procedure on the United States by mail on May 16, 1968. Interrogatory 27 reads:

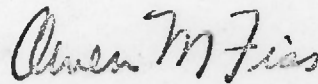
27. State the number of employees of the Department of Justice, including the FBI and the number of white employees and Negro employees. State the pay and civil service grade or rank, if any, of all white employees and of all Negro employees.

The United States maintains that this interrogatory seeks to elicit information that is neither relevant to the issues presented by this law suit nor

"reasonably calculated to lead to the discovery of admissible evidence," required by Rule 33. The complaint alleges a pattern and practice of racial discrimination by the defendants, and it is their employment practices, not those of the Department of Justice, which are the subject matter of this litigation. However, to the extent that defendants may be interested in obtaining the information sought in interrogatory 27, we point out that this information is contained in a document published in April 1968 by the Civil Service Commission entitled "Census of Federal Minority Employment" which is available to the public.

The United States therefore respectfully requests that its objection to Interrogatory 27 be sustained.

Respectfully submitted,

A handwritten signature in cursive script, reading "Owen M. Fiss".

OWEN M. FISS
Attorney
Department of Justice

CERTIFICATE OF SERVICE

This is to certify that a copy of the foregoing objections to interrogatories has been mailed to Thurlow Smoot, attorney for the defendants, 55 Public Square, Cleveland, Ohio, 44113, by placing a copy of it in the United States mail, postage prepaid, on the 27th day of May, 1968.

OWEN M. FISS
Attorney
Department of Justice
Washington, D. C. 20530