

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
	)	
	)	<u>INTERROGATORIES</u>
INTERNATIONAL BROTHERHOOD OF	)	
ELECTRICAL WORKERS, LOCAL NO. 38;	)	
ELECTRICAL JOINT APPRENTICESHIP	)	
AND TRAINING COMMITTEE,	)	
	)	
Defendants.	)	
	)	
	)	

The United States hereby serves upon the defendants, the International Brotherhood of Electrical Workers, Local No. 38 and the Electrical Joint Apprenticeship and Training Committee, the following interrogatories pursuant to Rule 33 of the Federal Rules of Civil Procedure, and requests the following information:

1. The name and last known address of all business agents who have been employed by Local 38 at any time from January 1, 1949, to October 1, 1967.

2. The name, title or position, and last known address of all officers of Local 38, including the business managers, who have served the union at any time from January 1, 1949, to October 1, 1967.

3. The date the Joint Apprenticeship Committee was established, and the name and last known address

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of all the officers of that Committee, including the executive or recording secretary, who have served the JAC at any time from the date of the establishment of the Committee to October 1, 1967.

4.(a) The name and last known address of all contractors under the Local 38 collective bargaining agreement on October 1, 1967, indicating as to each:

- (i) The date each contractor first signed the collective bargaining agreement;
- (ii) The number of employees regularly employed on October 1, 1967;
- (iii) The number of employees regularly employed for each contractor on the date each first signed the collective bargaining agreement;
- (iv) Whether the contractor is Negro;
- (v) Whether the contractor had been a member of Local 38 prior to becoming a contractor.

(b) For each of the following dates, give the total number of electrical contractors then under the Local 38 collective bargaining agreement, indicating the number of Negro contractors:

January 1, 1949;
January 1, 1955;
January 1, 1960;
January 1, 1965;
October 1, 1967.

5.(a) The total number of journeyman members in Local 38 as of each of the following dates:

January 1, 1949;

January 1, 1955;

January 1, 1960;

January 1, 1965;

October 1, 1967;

(b) The name, last known address, and date of admission of each Negro who is or had been a member of Local 38;

(c) The hourly rate of pay under the Local 38 collective bargaining agreement for journeymen as of each of the dates listed in paragraph 5(a);

(d) The total number of journeymen admitted to Local 38 since January 1, 1957, and the date of the admission or selection of each.

6.(a) The total number of apprentices in Local 38 on each of the following dates:

January 1, 1949;

January 1, 1955;

January 1, 1960;

January 1, 1965;

October 1, 1967;

- (b) The name, last known address, and date of admission of each Negro who is or had been an apprentice in Local 38;
 - (c) The hourly rate of pay under the Local 38 collective bargaining agreement for apprentices on each of the dates listed in paragraph 6(a);
 - (d) The total number of apprentices admitted to Local 38 since January 1, 1957, and the date of admission or selection of each.
- 7.(a) The period of time during which the hiring hall has been in operation;
- (b) The date on which the Local 38 hiring hall was first designated the exclusive source of employees for contractors under the collective bargaining agreement;
 - (c) The number of individuals who were referred out of the hiring hall one or more times during each of the following periods:

January 1, 1949, through December 1, 1949;

January 1, 1955, through December 1, 1955;

January 1, 1960, through December 1, 1960;

January 1, 1965, through December 1, 1965;

- (d) The total number of times workers were referred out for employment through the hiring hall during the periods listed in paragraph 7(c);
- (e) The name and last known address of all Negroes who have been referred out through the hiring hall since January 1, 1962, indicating from which of the four referral categories embodied in the collective agreement each was sent, and the name and last known address of the contractor to which they were sent;
- (f) For each month in the period from June 1, 1966, through September 30, 1967:
 - (i) The total number of individuals referred for employment through the hiring hall, indicating the number referred from each of the four categories described in the Local 38 collective bargaining agreement;
 - (ii) The total number of referrals made through the hiring hall, indicating the number referred from each of the four categories described in the Local 38 collective bargaining agreement;
 - (iii) The total number of days of employment resulting from the referrals through the hiring hall;

(iv) The total number of days of employment for Negroes resulting from referrals through the hiring hall.

(g) The dates, since November 1, 1958, on which the wireman's examination, required for Group I referral status under the Local 38 collective bargaining agreement, was given to non-members of Local 38, and the name and last known address of all persons who applied to take it, and those who passed it.

Dated this 17th day of October, 1967.

ROBERT J. ROTATORI
Assistant U.S. Attorney

OWEN M. FISS
ARTHUR D. WOLF
Attorneys,
Department of Justice