

local 38 file

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;	)	<u>INTERROGATORIES</u>
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. Do the defendants have any documents, correspondence, memoranda, papers, or records, other than the applications for admission, dues cards, applications for referral, and the minute books made available pursuant to the Rule 34 motion granted on January 12, 1968, which would indicate the procedure or method by which some or all of the current members of Local 38

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obtained admission? If so, identify such documents, correspondence, memoranda, papers, or records.

2. Do the defendants have any documents, correspondence, memoranda, papers, or records, other than the apprentice folders, apprentice applications, and minute books made available pursuant to the Rule 34 motions granted on January 12 and January 25, 1968, which would contain information regarding the operation of the Joint Apprenticeship Committee since January 1, 1957? If so, identify such documents, correspondence, memoranda, papers, or records.

3. Do the defendants have any documents, correspondence, memoranda, papers, or records, other than the apprentice folders, apprentice applications, and minute books made available pursuant to the Rule 34 motions granted on January 12 and January 25, 1968, which would indicate the persons who applied for admission to the union since January 1, 1957, as apprentices, and the action taken by the defendants with respect to the applications for admission? If so, identify such documents, correspondence, memoranda, papers, or records.

4. With respect to the efforts of electrical contractors to enter into collective bargaining agreements with the union, do the defendants have any documents, correspondence, memoranda, papers, or records which would contain information regarding those efforts,

such as letters of inquiry, application forms, and economic status reports, and regarding the action taken by the union? If so, identify such documents, correspondence, memoranda, papers, or records.

5. Do the defendants have any documents, correspondence, memoranda, papers, or records other than the referral slips, card histories, business agents' white cards, and referral applications made available pursuant to the Rule 34 motion granted on January 12, 1968 which would contain any requests made by electrical contractors for electrical workers since January 1, 1957? If so, identify such documents, correspondence, memoranda, papers, or records.

6. Do the defendants have any documents, correspondence, memoranda, papers, or records, other than the score sheets and minute books made available pursuant to the Rule 34 motion granted on January 12, 1968, which would contain any information concerning the racial policies of the defendants and the attempts by Theodore Pinkston and other Negroes to gain admission to Local 38, including but not limited to any documents, correspondence, memoranda, papers, or records received from or sent to George Meany, President AFL-CIO, Gordon Freeman, President, International Brotherhood of Electrical Workers, Frank Baldau, Executive Director, Cleveland Community Relations Board, and any public

official or agency since January 1, 1957? If so,
identify such documents, correspondence, memoranda,
papers, or records.

Dated this 21st day of February, 1968.

ROBERT J. ROTATORI
Assistant U. S. Attorney

Owen M. Fiss

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

CERTIFICATE OF SERVICE

This is to certify that the foregoing interrogatories of the United States, prepared pursuant to Rule 33 of the Federal Rules of Civil Procedure, have been served on Thurlow Smoot, attorney for the defendants, 55 Public Square, Cleveland, Ohio 44113, by depositing them in the United States mail, postage prepaid, on the 21st day of February, 1968.

Owen M. Fiss

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