

STATE OF MISSOURI)

SS.

COUNTY OF JACKSON)

(copy)

VIRGINIA OUSLEY STROUP being duly sworn upon her oath deposeth and saith:

My name is Virginia Stroup; I am twenty-nine years old and am at present a resident of Boulder City, Nevada, where I have lived for the past three months; I am married and have two children, aged respectively twelve and eight. The name of my husband is Ralph Stroup; he is a plumber by trade and is working for the United States Government at our present place of residence. Myself and family left Kansas City In January, 1936. Prior to moving from Kansas City we lived at 906 East 30th Street, Kansas City, Missouri.

I am a garment worker by trade and followed that vocation before my marriage and until June of the present year. My sole occupation at the present time is that of a housewife and taking care of my family and residence in Boulder City. I was born in Eldon, Miller County, Missouri, and was educated in the public schools of that county. My first work was as an apprentice in the garment factory of B. M. Oberman at Eldon, Missouri. It was a small factory; their produce was overalls and working clothes for farmers and laborers.

My father is an engineer on the Rook Island Railroad, I was the eldest of five children and went to work at the age of eighteen. I was married when I was fifteen years of age. My husband was a brakeman on the Rock Island and when a baby came I was compelled to go to work to add to the family income, which was meager.

I came to Kansas City in the year 1927 and shortly after my arrival in Kansas City want to work for the Donnelly Garment Company. There were a number of other girls who came from Eldon, Missouri, and from the same factory in which I worked there, and a great number of the garment workers in the Donnelly Factory were recruits from the small towns in Missouri and Kansas, where many small garment factories have been started on account of the low wages for which the country folks were silling to work on account of rigorous conditions on farms and in rural communities.

During my residence in Kansas City I newer worked for any other firm except the Donnelly Garment Company. When I came here, and for many years after my arrival, I

had no acquaintance or contact with any girls or women in the garment industry who belonged to a union and had no real knowledge of the purposes and workings of unions and was innocent of any knowledge of the tradeunion movement in this country so far as it affected girls and women.

While I was working for the Donnelly Garment Company many things took place that I believed to be unjust, injurious to the health of the girls, many of which a little consideration might have corrected and given the girls a better chance not only to increase their earnings but to have conditions less wearing and unhappy.

The first two weeks of my employment I worked in the present factory at 19th and Walnut and was then transferred to their factory in the Coca Cola Building on 22nd and Grand Avenue, where the company had one floor in which about one hundred girls were working. I stayed at work in the Coca Cola Building for several months until I was compelled to leave on account of my condition, a child being born to me several months after I left.

During the time I was in the Coca Cola Building the company was conducting experiments in new methods of production, in order to produce garments at the highest possible speed. The speed kept increasing during the months that I was there until at the time I left we were working so fast that I was hardly able to keep up with the demands that were made upon my strength. When I left I was exceedingly nervous and so tired at night that I was only able to sleep for short periods of time and became much weakened on account of the vast amount of work in the day and being unable to get a good night's rest.

When I was in the Coca Cola Building the main part of my work was on aprons. During the last three or four weeks of my work there they had me working on dresses such as they made in the 19th Street Building.

When I came back to work a few months after the birth of my child I was sent to the main factory in 19th Street. While I was at the Coca Cola Building we worked nine hours a day for five days, sometimes working a half day on Saturday and sometimes working the whole nine hours and frequently in rush seasons we were compelled to work a whole day on Sunday. The girls had no say-so as to hours, as to the length of their days, the

number of days or whether they worked on Saturday or Sunday. While I was working at the Coca Cola Building, by working these hours and straining myself as far as I possibly could I earned from \$8.00 to \$13.50 a week. I was what might be called an average worker in the way of ability and speed, perhaps slightly above average.

After the birth of my child, when I returned to work at the 19th Street factory, I worked there until my connection with the firm ceased in the latter part of April, 1935. When I went back to 19th Street I was put to work on all kinds of dresses. My work continued along this same line until the spring of 1935, when my employment ceased.

Prior to April, 1935, many of the girls were constantly making complaints about wages and the conditions imposed upon them in the factory. All of the work was piece work. They first had a rule there, imposed without any agreement with their workers, or without any voice on the part of the workers as to its justness, that they would fix a piece work price on all garments, and then if a girl could not make an annual minimum average of \$15.00 a week she couldn't work there any longer. The way this operated was that at the close of the season, no matter how hard a girl tried, if she didn't meet this demand there was a general weeding-out process of such girls. The trick in this system was that whenever the girls, by the hardest kind of work and after giving up a part of the half hour they had for lunch, were able to average an amount fairly large over the minimum wage, they would cut down the piece work price, which really meant successive cuts in their earnings. This happened over and over before I left the employ of the Donnelly Garment Company. The way they did it, the supervisor would put the work on the line, which means distribute the work to the girls, and watch it very closely for two or three weeks, When they found that the girl was making a good deal over the minimum they would cut down the piece work price.

All of these practices made the girls very much dissatisfied, I can safely say that there was never a week passed that I didn't see any number of girls crying over the way they were treated, the amount of work they had to do for the pay they were getting, and frequently from nervousness, the girls saying that they had to speed up to such an extent that they didn't believe they could stand it.

In 1932, Mrs. Elizabeth Reeves, the production manager, came through the building

and said to the different groups of girls that she was sorry but that they Just were compelled to make a general out in their pay. There was great indignation among the employees because all the reports from the outside were about wonderful prosperity of the Donnelly Garment Company and how they were spreading their product through the whole country and the tremendous amounts of money they were making. When this announcement was made in 1932, and the cut put in effect, to my own knowledge and from what the other girls told me they were turning out more work and of more expensive grades than they were in 1929.

Around 1930 and 1931 the company adopted the practice of sending managers and instructors through the building announcing that prizes would be given to the girls that turned out the most work in a week. The prizes consisted of kodaks, towels, hand-made napkins, which they claimed came from Porto Rico, salad forks and other small and cheap articles which appealed to girls and women. As I remember each girl in my section won four of the Porto Rican napkins, a bath towel, a Number 2 Blue Hawkeye Kodak and six salad forks. I still have mine. This system of prize giving caused the girls to work at top speed all over the factory in order to make all the money possible, as well as to win the prizes. At the end of these contests I have seen girls so nervous that they were unable to continue with their work and there were many lay-offs. The company had tickets upon which the girls were obliged to write their name, section number, and the number which was given to each girl for identification purposes. During these speed contests, and In fact on numberless occasions, I have seen these girls so nervous that their hand shook so that the writing they put on the cards could not be read and they had to be written over again.

During all of the years I worked at the Donnelly Factory the worst condition there was the speed-up system, which existed during all of my time there. The terra "speed up system" includes many things such as these: The speed at which the machine is operated is governed by a foot pedal controlled by the operator. A light pressure on the pedal makes slow speed and as the pressure on the pedal becomes greater the speed of the machine is increased. At the Donnelly factory the operators are required to keep their machines going at the highest possible rate of speed. It is the sectionalising of the

factory, which means that the manufacture of a garment in the Donnelly plant is broken up into the greatest possible number of operations, which makes this high speed possible. For instance, a girl who does nothing but binding can maintain a greater speed in that single operation than if she had to manufacture the entire garment. The same may be said of under-arming, hemming, joining and other operations.

Another bad feature from the operator's standpoint of this speed-up system is the monotony of it. The practical result of the system to manufacturer is to produce a garment at considerably less cost than is possible where the operator makes the entire or larger portion of the garment.

I worked in a garment factory in Los Angeles during the spring of 1937, where I made the entire garment and was paid at the rate of \$4.50 per dozen garments. The section in which I worked in the Donnelly factory often produced practically the same style of garment and I know that the entire cost to the Donnelly Manufacturing Company of the work on the dress was at least \$2.00 per dozen less. The result of the speed-up system to the operator is less income and greater exhaustion. In the other garment factories in which I have worked there were no sections and I have been told by operators who have worked in many garment factories where the same character and type of garments are manufactured as manufactured by the Donnelly Company, that such a system was not in vogue in any of the factories in which these girls worked.

While there was what I would call a rather general feeling and expression of dissatisfaction among the operators at the Donnelly plant, on account of the way we were required to work and what we considered the low pay, I never really discussed nor took any interest in the formation of or joining a union until about July, 1934, when some of the girls, and I particularly remember Ellen Fry, talked to me about joining. The first time I really discussed it seriously was when a group of girls met at the home of Glynn Brooke in July, 1934, for the purpose of discussing our grievances and trying to reach some conclusion regarding the union. I don't remember the names of all the girls who were present but I do recall that besides Glynn Brooks, Mamie Tubbesing and Ellen Fry were there. After the meeting about referred to I really became interested in the union and finally made up my mind to join. On October 18, 1934, I made application for

membership in Local Humber 118 of the International Ladies Garment Workers Union at the office of the local board in Kansas City, Missouri. Quite a number of the Donnelly operators had made application for membership before I did and there was a good deal of discussion about the Union and particularly among those of us who had joined.

About the time I made application for membership Mrs. Reeves called the section in which I was working to her office and I understood that all the other sections were likewise called to her office. When we were in her office she asked what any of us knew about the union and particularly whether we knew of any of the Donnelly employee having joined the union or attended union meetings. She told us that if any of us had any information about any of the Donnelly employee joining the union or becoming interested in the union she would very much appreciate it if we would report that fact to her.

On the 6th day of December, 1934, the charter of the Donnelly Garment Workers Union Number 124 was issued by the International Ladies Garment Workers Union, and at the organization of said local I was elected president.

In the early part of December, 1934, Mrs. Reeves called me to her office and questioned me concerning my union activities and told me that she understood some other girls and myself had picked up a girl in a car without telling the girl where we were going to take her and that when the girl found out we were taking her to a union meeting she jumped out of the automobile. I had never done or heard about such a thing. I told her that I knew nothing about any such incident. On December 12, 1934, my instructor, Mrs. Grace Gonotta, asked me if I belonged to the union and told me that those little Jews couldn't do anything for me and that "a big tub of fat" like Thelma Owens (one of the operators belonging to the Union) couldn't help a girl of my intelligence at all. When she had finished I told her that I had joined the union because thought it would be of benefit to me and to the other girls working in the factory and would enable us to get fairer treatment than we had had before. I also told her I was not ashamed of being a member of the union. A short time after my conversation with Mrs. Gonotta, Frances Reidel and I were called into the office of Mrs. Hyde, and when I got there Mrs. Reeves and Mrs. Gonotta were also present. Mrs. Reeves opened the conversation by asking me if I belonged to the union and I told her that I did. Mrs. Reeves then said "Just what do you

think you can do with a one-horse organisation. I don't care if you belong to 25,000 unions; there is nobody can tell us when we can lay a girl off or that we have to take her back. Where do you think you get authority to tell us how to run our industry." Just about about that time Frances Reidel entered the room and Mrs. Reevea said "How, Frances, that goes for you, too" You are a member of the union", and Frances said "Yes, I am." Mrs. Reeves then said, "I am getting darn sick of you girls carrying on like this." Then turning to me she said, "Virginia, how long have you worked here" and I said six years. Mrs. Reeves then said "During that time you have been a very punk operator; you, too, Frances* Your records are both very poor. We can lay you off any time we see fit and nobody can keep us from doing so." Mrs. Reeves then said to me "Just what is this organization of yours?" I replied " The organisation of the Donnelly Garment Company employees. I am the shop chairlady." Mrs. Reeves then said, "Well, now, isn't that lovely! Well, now, let me tell you one thing, you are going down there and make your average and if you don't out you go." I said "Well, Mrs. Reeves, there is some of the work that we can't make \$15.00 a week on", and Mrs. Reeves said "Oh, no, there isn't darling; other girls can do it and you can, too. You girls waste too much of the company's time kidding and going to the wash room. That has got to stop. Don't let us catch you talking, and you, Ella May Hyde, that is your job to see how many times these two girls go to the wash room and how long they stay. I am anxious to know what you will report to your office. By the way, what is your office?", to which I replied "I am to find out why you lay a girl off, and take it to the office." Mrs. Reeves replied "Indeed. I don't see that that is any business of yours. Mrs. Hyde, don't you put out any Information about why we lay a girl off. Virginia, you are just fixing to put a thousand girlies out of work and I certainly wouldn't want that on ay soul. I think you girls era just a couple of children misled. I ought to turn you over my lap and glee you a good spanking. Just what is your organisation for?" I said "Well, Mrs. Reeves, you call the office; they will tell you everything I have left out." Mrs. Reeves then asked me if Ollie Thompson was a member of the organization and I told her I didn't know, to which Mrs. Reeves replied "You don't even make a good liar." Then Mrs. Reeves said "Now, I don't care how many unions you belong to, all of them, if you think they will do you any good. Go tell Sol Goldberg he will do better if he

keeps his business right down there at his own place. Now you girls go back downstairs and get busy. You will be paid time for being up here, but remember. if you don't make your average, out you go", and turning to me she said "What do you think you could do anything about with your petty position." As we were leaving Mrs. Reeves called me back and said "Virginia, I just want to show you that last week you only made \$13.90 on this operation and Ollie made \$19.56. How do you account for that" and I said

"I couldn't say, Mrs. Reeves, because I worked terribly hard on those dresses, but I know how the girl did make part of it. She turned her pockets at noon time and I don't work at noon time since I joined the union." As I was leaving I said to Mrs. Reeves, "I have worked at the Donnelly Company for six years and have never been laid off previous to this union affair for incompetency; in fact, I have never been off of work and I was called back when the section was and in all the six years I haven't had six full weeks of lay-off." When I first became interested in the union and when I joined I had no idea that I would be criticised by anybody connected with the Donnelly plant for joining the union and until the conversation I have told about it didn't occur to me that I might lose my position with the Donnelly factory because I joined the union. After the events above related X couldn't help but notice a change in the attitude of those who were superior to me at the plant. Before this time all of the people connected with the Donnelly Company who had authority, and who came into contact with the operators were courteous and rarely ever spoke harshly to the working girls. After this time the slightest mistake I made brought a severe reprimand and on many occasions a threat that I would lose my position. I was never ashamed of having joined the union and the antagonistic attitude of my superiors at the Donnelly plant seemed to me to be altogether unjustified and made me believe that they were afraid if the union got a foot-hold in the factory it would result in better pay and better working conditions for the girls, so I became determined to continue my relationship with the union and try and see if I couldn't do something that would result in unionising the shop. I did not at any time neglect my work or talk unionism on the time of my employer. One of the first things I was told after joining the union, by the officers, was that I could not expect to hold my job unless I did my work in a satisfactory manner and there has never been any suggestion to me by anyone connected with the union to

try and get by with as little effort as possible. In fact, just the reverse is true.

A few days after December 12, 1934, a section was opened at 2609 Walnut Street, which is approximately eight blocks from the main factory, and every girl in the factory who belonged to the union was transferred to this building. There were a few non-union girls sent over there also. It was commonly called the "isolation ward" among the workers and it was looked upon by the operators generally as being a demotion to be sent to that building. I was humiliated by reason of the transfer and not at all happy about it, as the building was quite unsanitary, the lighting poor, and the conditions under which we worked not nearly so satisfactory as at the main factory. It was so cold in the building that many times the operators had to wear sweaters while at work. Most of the time there was no machinist at this building and we lost a great deal of time when our machines were out of order waiting for a machinist to come.

My instructor was quite fault-finding during the entire time I worked at 2609 Walnut Street, and often brought back to my machine bundles to be repaired which I had not made in the first place, and when I would call her attention to the fact that it was not my work she would often say "You need not think you are so smart just because you belong to the union and you are going to do what we tell you, union or no union." Of course, I always fixed my own repairs but I couldn't help but notice that after it became known in the factory that I was a member of the union more of my bundles were returned to me for repairs than at any previous time. I know the thing is true of other girls who joined the union. We had to make repairs on our own time.

During the entire five months I worked at 2609 Walnut Street my instructors treated me as I have stated above, and I noticed and commented, as did many other of the union girls, that there was a complete change in the attitude and conduct of our instructors after we joined the union.

Up to December 26, 1934, we had worked from 7:30 A. M. to 3:27 P. M. On that date the hours were changed to 9 A. M. until 4:57 P. M. We could see no reason for making this change, as there was only one section in the building and no difficulty about the elevator service and at that time of the year it was always dark before we could get home. We thought it was done because we had distributed pamphlets saying that we

were going to have a meeting of the union girls each Tuesday afternoon at 5 o'clock, and that this change in hours was put in effect to keep us from attending our five o'clock meetings.

During the early part of February, 1935, Mrs. Gray and Mrs. Strickland, both executives of the company, came to our section and passed among the girls cards which were applications for membership in the "Nelly Don Loyalty League." We were all asked to sign them. When Mrs. Gray reached me she held out a card, firmly grasped in her hand and said "Virginia, if you want this card we would be glad to have you but you can't carry water on both shoulders." I asked her if she meant that I couldn't belong to the union and to the Loyalty League, too, and she said I couldn't. I didn't sign one of the cards. Mrs. Gray said on this occasion that Mrs. Reed would not operate a union shop and that if the girls wanted to keep their jobs they had better join the Loyalty League and leave the union alone.

The issue of the "Nelly Don Athletic Association News" of February 13, 1935, contained the following: "The employees of the Donnelly Garment Company have, in the past week, formed the 'Nelly Don Loyalty League' to refute untrue statements and propaganda circulated by the union."

On January 25, 1935, I signed a letter, which was also signed by Meyer Perlstein, addressed to the Donnelly Garment Company, which called to the company's attention many of the things I have referred to in this affidavit. It is the same letter that is attached to the affidavit of Meyer Perlstein, which has been shown me, and begins on Page 15 of his affidavit.

In the latter part of April, 1935, I advised my instructor, Mrs. Allison, that my physician told me I would have to have a major operation which would prevent my working for some time and the doctor wanted me to have one week of complete rest before entering the hospital. I asked Mrs. Allison if I could take sick leave and I also talked to the nurse. This leave was granted and I entered the Security Benefit Hospital at Topeka, Kansas, about the first of May, 1935. My reason for entering the hospital at Topeka was that for a number of years I had carried a health and accident policy in the Security Benefit Association and under the terms of the policy I was required to go to this particular

hospital in order to secure the benefits from the policy. I remained in the hospital for seven weeks and my physician would not give his consent to my returning to work until About October 1, 1935. I received thirteen weeks sick insurance under the group policy I had as an employe of the Donnelly Company, the payments amounting to \$3.00 per week. After my physician told me I could go back to work about October let, I went to Mrs. Hyde at the Donnelly plant and told her I was anxious to return to work. She told me that they were not taking on any employes at that time, and I returned three different times, the 1st time about November 15, 1935. I was told the same thing each time, although I know new operators were being taken on at the Donnelly plant during this period. I waited in Kansas City until January 11, 1936, to hear from the Donnelly Company and having heard nothing I went to St. Louis and secured employment there. Further deponent saith not.

(Signed) Virginia Ousley Stroup.

Subscribed and sworn to before me this 00th day of October, 1937.

My commission expires 9-17-1941.

(Signed) Thomas R. Lawler,
Notary Pubic, Jackson County, Missouri.
(SEAL)

UNITED STATES DISTRICT COURT WESTERN DIVISION, WESTERN DISTRICT
OF MISSOURI

No. 2924

DONNELLY GARMENT COMPANY, a Corporation, and DONNELLY GARMENT SALES
COMPANY, a Corporation, Plaintiffs,

vs.

INTERNATIONAL LADIES GARMENT WORKERS UNION, et al, Defendants.

AFFIDAVIT OP VIRGINIA OUSLEY STROUP

(copy)

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Attorneys for Defendants