

AFFIDAVIT of

TILLIE SHIRLEY

(COPY)

COUNTY OF MISSOURI

SS

COUNTY OF JACKSON

Tillie Shirley, of lawful age, being first duly sworn upon her oath, says:

My name is Tillie Shirley. I am 43 years of age, married and reside at 2712 Kensington, Kansas City, Missouri. I have been a resident of Kansas City for 25 years.

I am at present employed by the Marlene Dress Manufacturing Company, located at 906 Broadway, Kansas City, Missouri, and have been so employed for nearly a year.

Prior to October, 1934, I was employed by the Donnelly Garment Company for approximately eight years. During my employment by the Donnelly Company and until the summer and early fall of 1934, no complaint was made about either the quality or quantity of my work. In the summer of 1934, I became interested in the trade union movement and discussed the subject with a number of the employees of the Donnelly Company and, in June, 1934, together with a group of Donnelly Employees, I went to the home of Glenn Brooks one night where the question was discussed and I then decided that I would make application for membership in the union, I afterwards signed an application for membership in the union, Local No. 124. The charter for the local was not granted, until the following December and I was one of the charter members. After the meeting at Glenn Brooks' house, I noticed a change in the attitude of the persons in authority at the Donnelly plant. I was told by one of the operators, Mary Brown, that if I joined the union I would lose my job but I did not take that seriously as I could see no reason why a membership in the union would interfere in the slightest with my employment. I had been told by those who had union experience that it was necessary for the union girls to make a particular effort to do good work and that we could not expect to hold our jobs unless we did so.

During the last three and a half years of my employment at the Donnelly Company, I was never laid off except when the entire section was let out on account of seasonal layoffs, which were usually about ten days or two weeks duration. During the last three and a half years, I had my vacation with pay each year. Under the rules of the Donnelly

plant, if any girl lost more than 11 days she was not entitled to a vacation with pay.

In October, 1934, there was a layoff and I expected to be recalled to work in the usual time. Mrs. Ella Mae Hyde, then Mrs. Guerrant, the employment manager, told me that I would be recalled. After the usual time had expired and I was not recalled, I went back and asked why I had not been recalled. I repeated this on three occasions and each time I was told I would be recalled, but I was not. I afterwards found out that all of the girls who met at the home of Glenn Brooks were treated the same way I was and none of them recalled for work, although some of them had been among the best and oldest operators in the plant.

During the time I worked in the Donnelly factory the operators had no voice in the fixing of piece work prices and if a price was fixed which enabled the girls to make more money than they had been making, the price was then reduced.

I have worked at three union shops since my employment at the Donnelly Company - the Eppy Coat Company, Missouri Garment Company and Marlene Dress Company. In each of these shops I have worked shorter hours and received better pay than I did at the Donnelly Company, and in all of these shops the operators, through their price-setting committee, had a voice in setting piece work prices.

Further deponent saith not.

(Signed) Tille Shirley

Subscribed and sworn to before me this 30th day of October, 1937.

(Signed) Harry Wellington.

Notary Public.

( SEAL)

My commission expires APR. 20, 1939.

In Equity No. 2924

IN THE DISTRICT COURT OF THE UNITED STATES FOR THE WESTERN DISTRICT  
OF MISSOURI, WESTERN DIVISION.

DONNELLY GARMENT COMPANY, a corporation, DONNELLY GARMENT SALES  
COMPANY, a corporation,

Plaintiffs,

vs.

INTERNATIONAL LADIES' GARMENT WORKERS UNION, an unincorporated  
association, DAVID DUBINSKY, president of said association, et al,

Defendants.

DONNELLY GARMENT WORKERS UNION, an unincorporated association, et al,

Interveners.

(COPY)

AFFIDAVIT OF TILLIE SHIRLEY

FRANK P. WALSH JEROME WALSH

Attorneys for Defendants