

CITY OF ST. LOUIS

ss

STATE OF MISSOURI

(COPY)

SAMUEL KLEIN, of lawful age, being duly sworn upon his oath, states that he is a citizen and resident of the State of Missouri, that he is 34 year of age and lives at 5598 Waterman Avenue, in said city of St. Louis, Missouri; that he is secretary, treasurer and manager of Klaso Garment Company, makers of what is known as "Mary Muffet" frock; that the Klaso Garment Company operates a manufacturing plant which is located at 1111 Washington Avenue, St. Louis, Missouri; that the garments produced by his company consist of ladies dresses made of silk, imitation silk such as rayons, acetates, cotton and linen; that this type dress and the material of which it is made is classified in the trade as a whole under the generally accepted code of the industry as silk dresses and the adopted wage scale and hours of work of the silk dress industry are applicable thereto.

Affiant further states that he is Past President of the Associated Garment Industries of Missouri and at the present time he is a member of the Board of Directors of said Association; that the Associated Garment Industries include among its members all of the manufacturers of silk dresses, as hereinbefore defined, in the city of St. Louis; that the Association consists of 45 manufacturing concerns which employ approximately 2000 workers and that the type of dresses manufactured by these concerns are dresses that are sold from \$2.25 per dress, wholesale, up to and including \$10.75 per dress, wholesale.

Our first collective relations with the union were established in 1933. This first agreement ran for one year and was renewed for an additional year in 1934. In 1935 the contract was again renewed but the term was extended to two years. Upon last Saturday, October 2, 1937, the agreement was again renewed for a period of two years.

During all the years mentioned, our relations with the union have been of extraordinary constructive value to the industry and while the wages of the workers have been gradually increased over this period of time, the efficiency and productivity of the

workers in the shops have proportionately increased as well. I can conscientiously say that we esteem our relationship with the union very highly and have always found the representatives of the union, without exception, reliable, fair and their cooperation valuable and constructive not only to the individual but to the industry as a whole.

Further affiant saith not.

Subscribed and sworn to before me this 5th day of October, 1937.

My commission expires February 18, 1941.

Notary Public within and for The City of St. Louis, State of Missouri.

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,

v.

INTERNATIONAL LADIES GARMENT WORKERS' UNION, et al,

Defendants

AFFIDAVIT OF SAMUEL KLEIN (COPY)

FRANK P. WALSH JEROME WALSH

ATTORNEYS FOR DEFENDANTS