

THEREUPON THE PLAINTIFFS to sustain the issues on their part, offered and introduced the following evidence, oral and documentary, to-wit:

ELIZABETH GATES REEVES,

called as a witness on behalf of the Plaintiff, having been first duly sworn and examined, testified as follows:

DIRECT EXAMINATION

BY SENATOR REED:

Q Please state your name?

A Elizabeth Gates Reeves.

Q Are you married?

A Yes.

Q Your husband and you live in Kansas City or suburb?

A Live in Edwardsville, Kansas, a suburb. Q You live a few miles from this place?

A Fifteen miles.

Q How long have you been a resident of Kansas City and its vicinity?

A About twenty-five years.

Q How long have you been employed by the Donnelly Garment Company?

A Eighteen years.

Q State the various capacities in which you have been employed?

A I started with the Donnelly Garment Company as timekeeper and worked in practically every department in the organization. Up until June, 1935, I was production manager of the Donnelly Garment Company, and since that time I have been merchandise manager.

Q What were the duties of the production manager?

A General charge of the factory - the producing departments.

Q Did that take you into all parts of the factory and familiarize you with all of the processes used in production?

A It did.

Q How, what is your present position would you say?

A Merchandise manager.

Q What are your duties in that?

A I authorize the purchasing of all materials and supplies and plan how much of each

garment shall he cut and planned, actual cuttings as to colors, size and so forth, along with general buying.

Q How long have you held your present position?

A Since June, 1935.

Q When you first went to work for this company eighteen years ago, about how many people were employed?

A About seventy-five people.

Q And about how many are employed at the present time?

A About thirteen hundred.

Q You say you buy the goods? Where are they bought? Are they bought in other states than Missouri?

A Yes, they are bought in the New England states, New York, principally.

Q And from there they are shipped into the State of Missouri?

MR. FRANK WALSH: We will admit all this to be in inter- state commerce.

SENATOR REED: Well, I had a little different point I wanted to bring out.

THE COURT: You may go into it briefly then.

Q When they are manufactured, are they shipped - where are they shipped?

A To all parts of the United States.

Q Do you have regular customers buy from you year in and year out?

A Yes, sir.

Q About how many of them are there?

A About eighteen hundred.

Q Where are they located - I don't mean individual places - are they located in the principal towns and cities of the United States?

A Yes, sir.

Q What is the amount of business, gross amount of business, of sales, at the present time and for the last three years or four years?

A About five million.

Q Per year?

A Yes, per year.

Q In the processes of this business is it necessary to have a large amount of goods on

hand?

A Yes, it is.

Q About how much would that run on the average?

A Gross, from 300,000 to one-half million.

Q Of goods on hand?

A For each season.

Q Is it necessary, in order to dispose of these goods, that they shall be manufactured promptly and marketed during certain seasons?

A Yes, sir.

Q That is, if I understand you, there are goods for spring, goods for summer and goods for fall and winter?

A Yes, sir, we have approximately six seasons during the year.

Q And if you do not deliver your goods promptly within the seasons, what results then?

A We would have to pay quite a loss, approximately fifty percent of the cost of material.

Q So if this factory was stopped at the beginning of the season, or during a season, would that result in a great loss?

A Yes, it would,

Q Would it be in excess of \$3,000.00?

A A great deal in excess of that.

Q Mrs. Beeves, I wish very briefly you would sketch the history of this company, its progress from the time when it employed seventy-five people to the present time, just very briefly?

A In 1922, when I went to the Donnelly Garment Company, we had one floor in the Coca Cola Building, which later we used as branch factory off and on during peak seasons. There were approximately seventy-five employees. Mrs. Reed and the Donnelly Garment Company were pioneers in the industry. And during that time, she has expanded and the company has expanded to where they now employ approximately 1300 people. From the very beginning of my employment, the Donnelly Garment Company always thought of its employees first, She insisted on wooden floors, which means an awful lot to anyone working in a factory. She always had adequate wash room facilities. Trained nurses were provided. Hospital rooms, cafeteria, light, adequate

lighting conditions. You want me to describe the manner in which we produced?

Q I wanted you first to tell us about how the employees increased from year to year.

A During the period of 1922, we had it - from 1922 until 1924, the policy of the Donnelly Garment Company was such that they would not put on any additional operators during the spring season, which is our peak period. After 1924, due to- I am sorry, I am getting mixed up here.

MR. WALSH: If your Honor please, I think it is going to be very difficult. The form of this testimony, of course I would object to. If the testimony is asked question by question; perhaps if Mr. Reed made a more definite explanation, of what he wanted from the witness, we could avoid it.

THE COURT: The witness says she is mixed up.

A It was a policy of the Donnelly Garment Company in the past, to only increase its employees during the fall line, and the rush we were able to take was due to the fact that the entire United States was not covered by salesmen. If there was any increase, as far as marketing our product, Mrs. Reed and the Donnelly Garment Company put on additional salesmen in the fall of the year. Then about 1924, the entire United States had been pretty well covered and it wasn't possible to put additional salesmen to get additional business during the fall of the year, so Mrs. Reed, in order to take care of the slack season, which in any cotton dress industry is approximately from July until October, put in her line, silks and wools in order to take care of this slack period.

MR. WALSH: I object to that and ask it be stricken out as not being responsive to the question.

MR. HOGSETT: It is material.

THE COURT: It isn't strictly responsive. If counsel thinks it is material, we will leave it in, A responsive answer hasn't been made to the question.

SENATOR REED: I will get it.

Q Mrs. Reeves, you said there were seventy-five people working for you when you went there. That number increased, I take it, year by year.

A Yes.

Q As the business grew. That is correct isn't it?

A Yes.

Q Now, you remember in 1932 and 1933 do you not?

A Yes, sir.

Q What happened during those years, 1932, 1933 and 1934 with reference to increasing the employees?

A It really started in 1931. Due to the fact that there was general unemployment throughout the United States. During the spring of 1931 and 1932, we had a great volume of business to be done in the spring of the year, so the employees themselves said they were perfectly willing to have these extra employees if Mrs. Reed would go out and buy 100 machines, which she did, because she wanted to, and she decided to change her policy and put on temporary employees. That same thing happened in 1933, and 1934. By that time we had approximately 300 employees that we considered temporary or extra employees, she gave work to during our peak, or busy season\*

Q You say there was a great deal of unemployment?

A Generally throughout the country.

Q What, if any, arrangement was made between the company and its old employees with reference to furnishing work to these new employees when there was not sufficient for them to do with reference to staggering the work?

A The employees themselves - during that time there was quite a lot of talk throughout the country of paying for the work and putting as many people to work by shortening the hours. The employees of the Donnelly Garment Company voluntarily went to Mrs. Reed and asked her or told her they would be perfectly willing to take less work, as far as hours were concerned, in order to keep some of these other people at work, whom they knew needed work Just as badly or if not so as much so as any of them.

Q Was that plan carried out?

A That plan was carried out.

Q For the purpose of furnishing work, so that some of these new employees would not have to be discharged or let out, when were the hours reduced to 44 hours a week?

A 1933 prior to the N.R.A.

Q Prior to the N.R.A.

THE COURT: You said 44 hours, do you mean that?

SENATOR REED: That is what I thought it was.

Q When were the hours reduced that had to be worked in the factory?

A To 40 hours? Just prior to the N.R.A. 1933.

Q That was done before there was any N.R.A. to make any changes?

A Yes, sir.

Q Now, Mrs. Reeves, about what was the average?

You are acquainted with business generally. That is this type of manufacturing throughout the United States, in a general way?

A Yes.

Q About what was the average of employment during the year in the factories all over the United States in the cotton - what you call the cotton dress business?

MR. FRANK WALSH: I will have to object to that as calling for an improper conclusion of the witness.

THE COURT: Inquire whether she has knowledge.

SENATOR REED: I understood she did. I asked that.

THE COURT: You may inquire more particularly as to that.

If there is a doubt, your objection Mr. Walsh goes to the foundation?

MR. FRANK WALSH: Yes, sir.

Q Well, Mrs. Reeves, in your conduct of this business through the years, did you come in contact with this business generally throughout the United States? Did you obtain a general knowledge with reference to the amount of time that these other factories operated on, full time, or anything like it?

MR. FRANK WALSH: We might object to that as entirely too general, if your Honor please, calling for an improper conclusion of the witness, not based on the facts.

THE COURT: You may inquire for the purpose of lodging an objection briefly.

CROSS EXAMINATION

BY MR. FRANK WALSH:

Q What factories were you familiar with in 1933 by observation?

A I had been in every factory in Kansas City.

MR. FRANK WALSH: You were asked about the country generally.

THE COURT: Let her answer the question.

A They would sell the departments that we do, and the majority of them did not bring out

any fall line during the year. They brought out a spring line, which started in January, and ended approximately the last day of May, so they didn't try to supply their customers with cotton dresses.

Q What factories did you go to?

A In Kansas City.

Q To every factory in the city?

A I did.

Q And observed them?

A Not at that particular time. I have at various times.

Q I am trying to confine it to the time Senator Reed was asking you about, what factories did you visit?

A Well, I have been to the Gordon Garment Company, the Gernes Garment Company, and I have been down to several of the factories on Broadway.

Q What factories are on Broadway?

A The Marlene Dress Company now I believe.

Q Was it there then?

A No.

Q No. I am trying to find out what you observed yourself, as distinguished perhaps from what somebody told you about. If you will just mention all the factories you now remember that you visited in Kansas City.

A I have been to those different factories off and on. I don't know exactly the dates. But I do know, also by observation, that at the end of May we would be flooded by hundreds of applications from different operators wanting jobs, because the season was over in all other factories.

Q You have mentioned all the factories you remember in Kansas City have you where you observed unemployment?

A I believe so.

Q Did you visit any factories in any other part of the country, and if so give the names as briefly as you can.

A No, I don't believe I did.

MR. PRANK WALSH: I would like to renew my objection.

REDIRECT EXAMINATION

BY SENATOR REED:

Q In the matter of the sale of your goods, did you become acquainted with the fact that a large percentage of what was called the cotton dress manufacturers only sold their goods and made their goods for certain seasons?

A Yes, sir.

Q About how long was the working season in the average factory with which you were acquainted?

A From four to six months. Q In this plant down here, what effort was made?

MR. FRANK WALSH: I want to renew my objection.

THE COURT: Mr. Reed, the Court's recollection is that the question you put to the witness was, in substance, whether she was acquainted with the general situation in the country with reference to the hours of work - 40 hours.

SENATOR REED: Not 40 hours. The least time during the year, that they were employed, was not inquired about with reference to the hours per week.

THE COURT: Oh, you were not -

MR, FRANK WALSH: (Interrupting) That was my impression also. The Senator said he meant the other thing - my objection stands because it isn't based on her knowledge of anything.

THE COURT: With the explanation of the Senator, he may now inquire further from the witness with reference to this.

Q What was done at the Donnelly Company to avoid this seasonal employment and give employment throughout the year?

MR. FRANK WALSH: I object to that as mere argument.

THE COURT: Overruled,

A We added silk and wool to our line during the short season of this time of the year,

Q And by this means, were you able to furnish year around, or substantially year around employment, to your regular employees?

A Yes, sir.

Q Has it been the custom or rule that has been followed in this plant?

A Yes, sir.



Q I want to drop that particular subject here and come back to it a little later. What has been the attitude of Mrs. Reed who was the president of the company, toward her employees and her relationship with them?

MR. FRANK WALSH: I object to that as absolutely immaterial if your Honor please, as not tending to prove any issues in this case,

THE COURT: That is one of the contested points here. It is overruled,

A Mrs. Reed's attitude has always been marvelous toward her employees, very cordial and friendly. She has treated them more as very dear friends than she has as employer and worker,

MR. FRANK WALSH: I object to that as not a statement of fact, a mere conclusion of the witness, and an improper conclusion, I never said that she was mean to her employees,

THE COURT: The testimony as objected to, of course, is rather a general conclusion than a statement. Let's dispose of this thing.

Q Mrs. Reeves, will you describe the building in which this business is being conducted, the quarters that are occupied.

A The Donnelly Garment Company is located at 1828 Walnut, the Corrigan Building, which was formerly occupied by the U. S. Postoffice. We have ten floors now and each floor is wooden, which means quite a lot in a factory.

Q Wooden what?

A Wooden floors, which is quite an innovation as far as a garment factory is concerned, because most of them have cement floors.

Q Were they put down for the purpose of protecting the employees?

A They were put down for the purpose of protecting the employees and before the Donnelly Garment Company would sign a lease for this building, that was one of the stipulations, that all floors must be covered by wood, in order to make working conditions better for the employees. We have one entrance, the front entrance, for all employees, whether they happen to be executives, operators, office workers, whatever they are. We also have back entrance which we at times have used. All employees have used that back entrance. The office is located on the 10th floor and the design room on the 9th floor, and the sewing machines on the other floors, the shipping department, cutting department and so forth. There is no difference whatever between one floor and the

other. We have adequate wash room facilities which are inspected thoroughly by the Health Board. We have two trained nurses that see to the welfare of the employees. And may I take up the other things?

MR. FRANK WALSH: (Jo ahead.

THE COURT: I think that meets the question as to the reason for your company unionizing, among other things. Proceed.

Q Mrs. Reeves, what I was asking you to do, and I will come back to this subject, was to describe the building. Is it a fireproof building?

A It is a fireproof building.

Q What about - how is it lighted?

A By electricity and also daylight, but mostly daylight because it is the north side. On three sides of the building, there are windows, very light, well ventilated.

Q How many floors did you first occupy when you moved in there? A We first had I believe five floors, when we first moved in.

Q The upper floors?

A The upper floors.

Q And the postoffice was below?

A In the lower floors, yes, sir.

Q You know when you got additional floors?

A From time to time, but I couldn't tell you the definite dates.

Q And finally the post office moved out, and the whole building has been taken over?

A Yes, sir.

Q Somebody suggested I hadn't asked you when you moved into this building?

A In 1928.

(Photograph marked Plaintiffs' Exhibit 1 for identification. )

MR. FRANK WALSH: We will admit that that is the photograph of the building.

THE WITNESS: Yes, that is the building we occupy.

MR. FRANK WALSH: No objection to it, if your Honor please.

THE COURT: You offer it now?

SENATOR REED: We offer it in evidence.

THE COURT: It will be received.

(Thereupon, plaintiffs offered and the Court received in evidence Plaintiffs' Exhibit 1, which is as follows:)

(Photographs marked Plaintiffs' Exhibits 2 to 27, inclusive, for Identification.)

Q I show you Exhibit 2 and ask you if that is a view from a different door of the same building?

A Yes.

SENATOR REED: Now, for the record I introduce Exhibit 2 in evidence.

(Thereupon, plaintiffs offered and the Court received in evidence Plaintiffs' Exhibit 2, which is as follows:)

Q I will ask you how many floors this building has?

A Ten.

Q Before I go into that, when the goods are brought to the factory where the raw materials are that you manufacture where are they delivered?

A To the dock.

Q And from the dock do they - where do they go?

A To the third floor, to our receiving room.

Q And from there where?

A To the cutting department.

Q I wish you would tell the Judge, beginning with the cutting department, how the goods are handled there. I don't mean the details, whether they are cut there and how many pieces are cut at one time, how they are cut?

A The raw material is delivered to the cutting department, and the cutters, the members of the cutting department, spread the piece goods and lay it in layers back and forth on the long cutting tables and they are from 100 to 250 layers of piece goods high, depending on the type of material that is used. If you are using cotton voile, you can cut cotton voile higher than you could if you were cutting seersucker or some heavier material. After they are spread, we use perforated patterns entirely - that is, the pattern is made, sent to the cutting department, spread on top of these layers of piece goods and cutters follow the perforation that is marked in on the piece goods and cut.

Q Cut with a pair of sheers, or cut with a machine cutter?

A With a power machine cutting knife.

Q You say they follow these patterns. Where are the patterns made?

A In our pattern department.

Q And before the patterns are made, what is done with reference to designs? Are the designs made, or samples made that are to be followed? You have a designing department do you not?

A We have a designing department which is quite an expensive department. We have designers that originate and create individual designs for the Donnelly Garment Company. After they are designed, why they are given to sample people who do nothing but manufacture this original one garment. The work on each particular garment is planned out in detail in order to make it Just as easy as possible for the operator to work on that particular garment when it goes down to her. That work is all done in a very expensive planning department.

Q Do you know about how much money is spent in that department?

A About \$100,000.00 a year annually.

Q Does that facilitate the work of the piece workers when it gets to them?

A Yes, because everything is planned out in exact detail. Nothing is left for the operator to try to figure out for herself.

Q When these patterns then are made, then they are reproduced on the goods in the cutting department, and the various pieces are cut, sometimes more than 100 at one time?

A Yes. Generally 200 at a time. May I explain about these patterns?

Q I wish you would.

A We use a perforated pattern, which as I explained before, is done upstairs by our pattern maker, is sent down to our cutting department, so our cutters, all they do is just take some chalk and lay out the pattern on a piece of goods, and dust the pattern in, and follow the lines that have been dusted in on this lay of material, which is entirely a different method and isn't used that I know of in hardly any other factory in the United States.

Q In cutting up these goods, are there a great many pieces?

A Yes. If it happens to be a six gore skirt. In other words, if the skirt has six pieces to it, each one of those pieces is cut out, sleeve cut separately, cuff separately, and the

pocket, and anything that goes into making up that garment is cut separately and put in bundles and sent down to the operator. Anything in our method of manufacturing - if we were sewing lace on a garment, and we have sewed lace around the collar, that lace would be measured off, so that the operator wouldn't have to take her time to figure out how much lace went on that garment. It is measured out and sent down in a separate bundle.

Q Examine Exhibit 3, and tell his Honor whether that is a photograph, a correct photograph of the cutting room so far as it shows the cutting room?

A That is the cutting room and this is our spread. This is a laying of piece goods and this laying, approximately, from looking at it, I would Judge to be about 300 layers of cloth high. This one here, due to the fact it happened to be an embroidered cotton is about 100 high. Here is our electric cutter.

MR. FRANK WALSH: Do I understand when you dust in a pattern, that is on the top layer of the cloth, it is cut clear through 100 or 200 layers?

THE WITNESS: Yes, sir.

Q Was this photograph taken right during working hours?

A Yes, sir.

Q And these pictures in here are the pictures of the

SENATOR REED: I offer Exhibit 3 in evidence. (Thereupon, plaintiffs offered and the Court received in evidence Plaintiffs' Exhibit 3, which is as follows:)

A That is another view of the cutting department and they are working entirely by daylight.

(Thereupon, plaintiffs offered and the Court received in evidence Plaintiffs' Exhibit 4, which is as follows)

Q When these goods from the cutting department have been put into bundles where are they taken?

A Before they are put into bundles, they are sent over to what we call our dividing department. They are cut in blocks by a block, I mean all the sleeves, as high as 200 sleeves and are sent over to this dividing department, the dividing department which this picture represents divides everything that goes to the pattern size and then this bundle is

sent downstairs to the sewing sections. What I am trying to explain is that we might have 200 size 18. We don't ever send 200 size 18 down to our sewing factories. We send not more than 24 garments in one bundle to be made at one time. They take the first 24 off the top lay, and bundle them in a separate bundle with everything that goes in to make that garment and send it down to our sewing department.

Q You have been describing Exhibit 5. That is a photograph showing operation in the bundle department.

A Or bundling department.

Q That is a correct photograph?

A Yes, sir.

Q That shows then actually the work?

A Yes.

(Thereupon plaintiffs offered and the Court received in evidence Plaintiffs' Exhibit 5, which is as follows).

A These bundles go down to the different sewing sections.

Q Describe the sewing department.

A We have our factory so arranged that there are approximately 40 machines to one section, as we call them, and each section has two time workers that assist and help the girls in making the garments. What I mean when I say assist and help, they carry their bundles to the machines, they carry the thread to the machines; in other words, they wait on them and have everything there available for the operator to sew.

Q Is this picture here Exhibit 6 one of the photographs of a part of the sewing department.

A Yes. These two machines here - - these two rows represent approximately 40 machines to a section. Back there is another section.

SENATOR REED: I offer Exhibit 6 which the witness has had in her hand.

(Thereupon plaintiffs offered and the Court received in evidence Plaintiffs' Exhibit 6, which is as follows:)

Q I show you Exhibit 7, asking you to describe that and tell what it is.

A This is another sewing section, the same as the other pictures, different view.

SENATOR REED: I offer Exhibit 7 in evidence.

(Thereupon plaintiffs offered and the Court received in evidence Plaintiffs' Exhibit 7, which is as follows:

A Exhibit 8 is another view of the same sewing sections

SENATOR REED: I offer Exhibit 8 in evidence. (Thereupon, plaintiffs offered and the Court received in evidence Plaintiffs' Exhibit 8, which is as follows:)

A Exhibit 9 are examiners or inspectors. After the garment has been made with the inspection of pressing, folding, bottonhole work.

Q They do what? Inspect the work after it comes out?

A Yes.

SENATOR REED: I offer Exhibit 9 in evidence. (Thereupon, plaintiffs offered and the Court received in evidence Plaintiffs' Exhibit 9, which is as follows:)

A One of our operators working on an embroidery machine. These are the embroidery designs that she has made.

SENATOR REED: I offer Exhibit 10 in evidence. (Thereupon, plaintiffs offered and the Court received in evidence Plaintiffs' Exhibit 10, which is as follows:)

A A shirring machine. This type of machine that she has is a shirring machine.

Q Tell his Honor what a shirring machine is.

A When you shir something up like that, this particular machine shirs six rows at a time. This happens to be double stitching or multiple stitching, as the shirring would be the same principle only it would be shirred and there would be crinkles in between.

SENATOR REED: Offer Exhibit 11 in evidence. (Thereupon, plaintiffs offered and the Court received in evidence Plaintiffs' Exhibit 11, which is as follows:)

A Taking a machine double stitching — and an attachment comes up here, a two-needle machine, this is set on top of a piece of garment as trimming on a woman's dress. MR.

FRANK WALSH: Oh, yes, I see.

(Thereupon, plaintiffs offered and the Court received in evidence Plaintiffs' Exhibit 12, which is as follows:)

A This is a double stitcher seam binding machine. It seam-binds the two side seams of a garment together and at three and a fourth inches back of that, it makes a seam of all the stitching.

Q The result of that is, you do the work quickly on these machines?

A Yes. It binds it together in order that we don't have a raw edge and it stitches it after it is bound in, so the customer can let it out in case it doesn't fit.

SENATOR REED: I offer Exhibit 13 in evidence. (Thereupon, plaintiffs offered and the Court received in evidence Plaintiffs' Exhibit 13, which is as follows:)

Q I show you Exhibit 14 and what does that represent?

A Exhibit 14 happens to be one of our designers in the designing department working at an original print which we are going to put on some of our piece goods and have printed up.

Q That is something designed by one of your designers?

A Yes. She happened to design this, and drew up this design, and thought it would make a pretty pattern for a piece of piece goods.

Q What was that made from, do you know?

A Thistle.

Q What do you do with the design when it is made?

A We send it to New York, have it redrawn, give it to the mill after it has been reproduced, a brass roller is made, a dye in our colors that we are going to use, prints that on the cloth, comes out with a piece of material with the flower on it.

Q With the original design - the mill does that work?

A Yes, but we start the idea and thought out here most of the time.

Q Generally do you make one individual design?

A Our line of merchandise which we sell consists of I would say, 98 percent of design patterns that no one else uses. We are the only users of those particular patterns.

Q Do you know whether or not, for some years, that representatives of the company visited Paris and employed original designers there to design for you the latest patterns?

A Yes, sir.

Q Was that of great advantage, to early production?

A It was a great advantage, because it was impossible to buy any attractive piece goods, in our opinion, and in order to get unusual and different designs, why, Mrs.

Reed herself and her crew of designers from time to time would go over to France and pick out some of these original patterns and buy them from the designers and bring them back to this country, and have the mills print them on different piece goods, and they



would be our own exclusive designs. At one time, Mrs. Reed had, for at least four years, a Paris representative, who kept up on all the latest styles information.

Q After you get those designs, and get your goods out, what happens with reference to the pirating of them by other concerns?

A It was impossible for them to steal our exact piece goods on account of the length of time, but they did everything in their power to steal our design of the garment.

Q You know whether or not there was some litigation over that?

A Yes, there was in one of our aprons, a Handy-Dandy apron. We happened to have a particular one.

SENATOR REED: I offer Exhibit 14 in evidence. (Thereupon, plaintiffs offered and the Court received in evidence Plaintiffs' Exhibit 14, which is as follows:)

A Fifteen is one of our designers who is working with an operator who works on her original cottons.

SENATOR REED: I offer that in evidence, Exhibit 15. (Thereupon, plaintiffs offered and the Court received in evidence Plaintiffs' Exhibit 15, which is as follows:)

A This happens to be our notion department. These young- ladies are measuring out belts that go on our garments.

Those are put in separate bundle tickets, when they get downstairs in our pressing and folding department, they meet the regular bundle and all the girls have to do is to put them in the individual dresses. All that work has been done for the operators by time workers.

Q Does that facilitate their work?

A It certainly does.

SENATOR REED: I offer Exhibit 16 in evidence. (Thereupon, plaintiffs offered and the Court received in evidence Plaintiffs Exhibit 16, which is as follows:)

A Exhibit 17 is our receiving department where all raw material is received.

SENATOR REED: I offer Exhibit 17 in evidence. (Thereupon, plaintiffs offered and the Court received in evidence Plaintiffs' Exhibit 17, which is as follows:)

A Exhibit 18 is our shipping stock room, where we take the garments out ready for shipment.

SENATOR REED: I offer Exhibit 18 in evidence. (Thereupon, plaintiffs offered and the

Court received in evidence Plaintiffs' Exhibit 18, which is as follows:)

A Exhibit 19 is our cafeteria, where the girls have their food at a minimum cost.

SENATOR REED: I offer that in evidence.

(Thereupon, plaintiffs offered and the Court received in evidence Plaintiffs' Exhibit 19, which is as follows:)

A Number 20 is our hospital room, with a trained nurse in charge, and there are beds in case anyone wants to go down there and lie down.

SENATOR REED: I offer Exhibit 20 in evidence. I will stop at that room a moment, (Thereupon, plaintiffs offered and the Court received in evidence Plaintiffs' Exhibit 20, which is as follows:)

A Two.

Q Are there places in this department for girls or women who are — or men for that matter, - who are feeling ill, to lie down? And be waited upon and attended by these nurses?

A Yes, sir.

Q Are these regular, skilled professional nurses you employ?

A They are registered nurses.

Q Has that been true for many years?

A Yes.

Q Well, —

A (Interrupting) since almost the beginning of the company, since I have been there there has been trained nurses. SENATOR REED: I offer Exhibit 21 in evidence.

(Thereupon, plaintiffs offered and the Court received in evidence Plaintiffs' Exhibit 21, which is as follows:)

A Number 21 is one of our nurses at a medicine cabinet.

Q You keep medicine there for your employees?

A Yes, sir, free of charge.

Q Free of charge. All right. What is Exhibit 22, which I now offer in evidence?

A That is a Christmas Party that Mrs. Reed gives annually for all of her employees and their children, mostly for their children, and at the party she distributes toys and so forth, entertainment. Here is the whole picture. Mrs. Reed, herself, mingling with the

employees and being part of the party.

Q Now, at these parties they give, do you and the other people who are in the office, the office help, do they attend and mingle with these people?

A Yes, sir. There has never been any difference made between any employees of the Donnelly Garment Company.

SENATOR REED: I offer Exhibit 22 in evidence. (Thereupon, plaintiffs offered and the Court received in evidence Plaintiffs' Exhibit 22, which is as follows:)

A It is another view of the Christmas Party. This happens to be the first party we gave. That was years ago.

(Thereupon, plaintiffs offered and the Court received in evidence Plaintiffs' Exhibit 23, which is as follows:)

A Another view of the Christmas Party of 1936.

SENATOR REED: I now offer it in evidence. (Thereupon, plaintiffs offered and the Court received in evidence Plaintiffs' Exhibit 24, which is as follows:)

A Christmas Party.

(Thereupon, plaintiffs offered and the Court received in evidence Plaintiffs' Exhibit 25, which is as follows:)

BY MR. INGRAHAM:

Q I will hand you Exhibit 26. Will you please tell what that is a picture of?

A It is a picture of a picnic the Donnelly Garment Company employees gave in 1930.

MR. INGRAHAM: Plaintiffs now offer in evidence Exhibit 26.

(Thereupon Plaintiffs offered and the Court received in evidence Plaintiffs' Exhibit 26, which is as follows:)

Q I hand you Exhibit 27. Will you state what this is a picture of?

A This is a picture of the Nelly

Don Pioneers' luncheon which was given in Mrs. Reed's office.

Q Will you explain to the Court what you mean by Pioneers?

A We have a Pioneer organization down at the factory. Any employee who has been with the company for 15 years is a member automatically of this particular organization.

Q Do you know how many people are in the Pioneers at the present time? A I believe

there are about 60.

Q Some of those people have worked for the Donnelly Garment Company for longer than 15 years?

A That is right.

MR. INGRAHAM: The plaintiffs offer in evidence Exhibit 27.

(Thereupon Plaintiffs offered and the Court received in evidence Plaintiffs' Exhibit 27, which is as follows:

BY SENATOR REED:

Q Who got that up, the employees or somebody else?

A I believe the employees. I am not sure.

Q You were speaking about the regulations there, or provision that was made in the company for the benefit of employees, namely the nurses in the hospital and the care there. What, if any, arrangement is made for the hospitalization of patients who are sick or injured?

A Every employee of the Donnelly Garment Company is entitled to hospitalization under the hospitalization plan, the company paying fifty percent of the costs every year, and the employees the other fifty percent.

Q What is the fact with reference to Insurance? What is the arrangement about that, if any?

A Every employee of the Donnelly Garment Company is entitled to carry life insurance, and also sick insurance - the company is standing fifty percent of the premiums, and the employees fiftypercent of the premiums. In regard to our health insurance, our record was so high last year, the insurance company gave back in premiums over \$6,000.00, and Mrs. Reed immediately turned that back to the employees.

Q When you say your record was so high, do you mean your loss through sickness was so low that there was a return of the premium?

A That is right.

Q What is the rule there with regard to vacations on pay?

A Every employee who hadn't been absent over a certain number of days in the year - I believe it was 11 in the beginning, was entitled to a week's vacation with pay, and later on two weeks.

Q What, if anything, was done with reference to providing recreation places for the employees?

A We have a club room for the boys downstairs in the building and the girls have a recreation room on the second floor of the club house that has been given to the employees of the Donnelly Garment Company for their benefit by Mrs. Reed, called the Nelly Don Country Club, where anyone can go out or entertain their friends and their companions in the business, and picnic grounds where they can give wienie roasts or anything like that that they want.

Q Turning now to the method of manufacture, when these goods are cut in the cutting room. When they have been divided you say they are sent down to the various sections? Is that right?

A That is right.

Q And are they there delivered to the operators?

A Yes, sir.

Q Now will you tell the Court how that is carried out, that is whether an operator is given the job of making an entire garment, or whether they only make a part of the garment?

A Each operator does a certain part on the making of the garment. She has her own individual bundle to work on and her own Individual machine. She runs that machine just as fast as she thinks she is capable of operating, and she has full control as to how fast or slow she prefers to go. In our section, of course, we may divide our work up. One operation might be setting pockets. That girl does nothing but set pockets on that particular garment. Another operation might be hemming a garment. That girl does nothing but hem the garments. Then we have other people who might be doing different types of work. For instance, if one girl has been working on the skirt of a garment, and another girl or group working on the waist, we have time workers that match these different parts of the garments together, so that the operator doesn't have to do any of that work herself, so she doesn't have to be thoroughly experienced, except in her particular type of work.

Q Is there any system there by which any operator is compelled to operate all parts of the machine to get out the work?

A Positively not.

Q So that, if I understand you correctly, when a girl is given a bundle of work, she works on that as she sees fit, and when she is through, she calls for more work. Other girls are working on other pieces, and each time then they get through with their particular bundle, they call for more work and get it?

A Yes, that is right.

Q How are these goods sold, over the counter or through the mails, or by traveling salesmen?

A They are sold by traveling salesmen.

Q Do these traveling salesmen visit your different customers in different parts of the United States?

A Yes, sir.

Q Where you have customers?

A Yes, sir.

Q And generally speaking, how extensive is your business as to the disposition of states?

A We sell to every state in the United States and all principal cities and towns.

Q Do you have an account in Boston?

A Yes, sir.

Q New York?

A Yes, sir.

Q Philadelphia?

A Yes.

Q And in the other large cities throughout the United States?

A Yes.

Q About what percentage of the garments are sold in other states than the State of Missouri?

A Approximately ninety percent.

Q Do each of these companies - that is the sales company and the garment company sell some goods in the State of Missouri and some outside?

A Yes. They both do.

Q But people who work at the machines, they work on piece work do they? A Yes, sir.

Q And are paid by the piece?

A Yes.

Q Are there other employees who are engaged in production aside from these piece workers?

A Yes.

Q What are they?

A They are inspectors, and people who match up bundles of work; people who work in notion departments, who prepare work for the operators; cutters, pattern makers, office help of all kinds.

Q Do they work on weekly wages, or how are they paid?

A They are paid on a weekly basis.

Q What is the proportion of these weekly paid people in your plant compared with ordinary plants?

MR. WALSH: One minute. I object to that if your Honor please as calling for an improper conclusion of the witness.

THE COURT: Counsel may inquire and lay a foundation if she knows what ordinary plants are.

Q, I will limit this to union plants here in this town.

Plants unionized by the defendants,

A Do you mind repeating the question?

Q I want to know how the proportion and number of these persons who prepare the work and facilitate the operations in your plant, compares with the situation in other union plants in Kansas City, whether you have a greater proportion or less proportion?

A I would say we employ seventy-five percent more than the other plants.

Q Does that fact contribute to the facility and ease with which the operator on machines can produce a certain number of garments?

A It certainly does.

Q I think I asked you this. Prior to 1933 what was the number of regular working hours in your plant?

A Forty-five and one-fourth hours. No - forty-six and one-fourth hours, and then later, forty-five hours prior to 1933.

Q At what time in 1933 did you reduce the number of hours to forty?

A Just prior to the NRA.

Q Do you remember the month?

A I think it was in January.