

6740

Record to

FILED

NOV 17 1909

J. M. C. D.
CLERK OF SUPREME COURT

Supreme Court

Gen. No. 7930119

Ritchie & Co. (a cork) et al

Hayman et al et al

UNITED STATES OF AMERICA.

State of Illinois, }
 COOK COUNTY. } ss.

PLEAS, before the HONORABLE R. S. Puthull one of the Judges
 of the Circuit Court of Cook County, Illinois, at a term thereof begun and held at Chicago, in the Court
 House in said County and State, on the third Monday (being the 16th day) of
August in the year of our Lord one thousand nine hundred and Nine
 and of the Independence of the United States, the one hundred and Thirty-fourth
 Present, HONORABLE R. S. Puthull one of the Judges of the Circuit Court
 of Cook County, State of Illinois.

John E. W. Maymaw State's Attorney.
Christopher Strassheim Sheriff.

Attest: JOSEPH E. BIDWILL, JR., Clerk.

Be it remembered that heretofore, to-wit, on
 the 3rd day of September
A. D. 1909 a certain Bill of Complaint
 was filed in the office of the Clerk of said
 Court, in words and figures following to-wit.

copy

Term No. **5715**

Gen. No. **293029**

IN THE
Circuit Court of Cook County.

W. C. RITCHIE & COMPANY, an Illinois Corporation, W. E. RITCHIE, ANNA KUSSEKOW and DORA WINDEGUTH

vs.

IN CHANCERY.

JOHN E. W. WAYMAN, as State's Attorney for Cook County, and EDGAR T. DAVIES, as Chief Factory Inspector for the State of Illinois and Cook County.

BILL OF COMPLAINT.

HAYNIE AND LUST,

Solicitors for Complainants.

WILLIAM DUFF HAYNIE,
Of Counsel.

STATE OF ILLINOIS, }
COUNTY OF COOK. }

IN THE CIRCUIT COURT OF COOK COUNTY.

W. C. Ritchie & Company, an Illinois corporation, W. E. Ritchie, Anna Kusserow and Dora Windeguth

vs.

John E. W. Wayman as State's Attorney for Cook County and Edgar T. Davies as Chief Factory Inspector for the State of Illinois and Cook County.

In Chancery.

To the Honorable the Judges of the Circuit Court of Cook County, Illinois, In Chancery Sitting:

W. C. Ritchie & Company, an Illinois corporation, W. E. Ritchie, Anna Kusserow and Dora Windeguth, complainants, bring this their bill of complaint on behalf of themselves and all others who are interested in or will be affected by the conduct of the defendants herein complained hereof, and the determination of the questions and issues hereby submitted and who sustain like relations to the defendants, and who may have a right to join herein and shall desire to do so, and who are willing to share in the costs of this suit and by leave of court may be allowed to join herein, against John E. W. Wayman as State's Attorney for Cook County and Edgar T. Davies as Chief Factory Inspector for the State of Illinois and Cook County, and show unto your Honors the following:

I.

Your complainants respectfully show unto your Honors that W. C. Ritchie & Company, a co-complainant, is a corporation organized and existing under and by virtue of the laws of Illinois and that under and by virtue of the grant of powers under its charter it is engaged in the business of manufacturing and selling paper boxes, paper cans, mailing tubes, paper box machinery, strawboard and all other materials necessary or pertinent to the manufacture of paper boxes, paper cans and mailing tubes.

II.

That the co-complainant Dora Windeguth is a resident of the County of Cook and a citizen of the State of Illinois and that she is engaged as an employe in the factory of W. C. Ritchie & Company, one of the co-complainants herein, and show unto the court the following:

III.

That said co-complainant Dora Windeguth is now forty-five years of age and since she has been thirteen years old has been employed by W. C. Ritchie & Company, or its predecessors, and during such period of time has learned the paper box business thoroughly and that the following are the departments through which she has passed: When she first entered the employ of said firm she was placed at work in manufacturing what are known as "common brown" boxes and that the same simply involve the shaping, pasting and trimming around the edges of ordinary brown strawboard boxes and she worked in said department for about two years. She

then went into the department where "white print" boxes are manufactured, which are similar to the "common brown" except that a better quality of strawboard is used in their manufacture, and that the bottoms, sides and inside are covered with white paper which is pasted on and that the common form of shoe box is a familiar type and that she was employed in said department for four years and from said department went into the department where she is now employed, wherein is manufactured shelf boxes, filing cases, strawboard shelf boxes, the assembling and lining of wooden shelf boxes, and the manufacture of suit boxes; and that said department wherein she works is the heaviest and most severe department in the whole paper box business, and the one which taxes the endurance of the employe most. That the average weight of the boxes in this department is three and one-half pounds and that it is impossible for a highly skilled workman to turn out more than four an hour; that they receive for the same four and sixty-two hundredths cents (4.62c) apiece, which is a fair and reasonable wage.

IV.

Your complainants further show that during said thirty-two years during what is known as the busy season, as hereinafter stated in detail to your Honors, said co-complainant Dora Windeguth has worked on an average of three days a week overtime, and shows unto your Honors that the regular hours in said factory are from 7:30 in the morning to 5 P. M., with one-half hour for lunch and that during the busy season employes must work extra from 6 P. M. to 9 P. M. and that said co-complainant has

not noticed at any time any ill effects from her work; that she has never had occasion to consult a doctor for illness and is in as full strength and vigor as at any time during her life and that she is considered to-day one of the most skilled workers in her department.

V.

Your complainants respectfully show unto your Honors that said co-complainant Anna Kusserow is a resident of County of Cook and a citizen of the State of Illinois and thirty-two years of age, and show unto your Honors the following:

VI.

That since the age of sixteen years she has been engaged as an employe in the manufacture of paper boxes and that she has for sixteen years been in the employ of W. C. Ritchie & Company, one of the co-complainants herein, and that she originally started in the beginner's department in said factory, which is that one wherein are made "common brown strawboard boxes" and that from that department she went into the white print box department and for the last ten years has been employed in the heaviest department in said factory wherein are made the heavy filing cases and strawboard shelf boxes, as hereinbefore stated to your Honors, and that she has for the past sixteen years, during what is known as the rush season, worked overtime, as hereinbefore stated, on an average of three days a week, keeping the hours as hereinbefore stated by the co-complainant Dora Windeguth, and that she has never had occasion to consult a doctor and has never noticed any ill effects from said work.

VII.

The complainants show unto the court that in the department wherein are employed said co-complainants Anna Kusserow and Dora Windeguth it is necessary to stand for two-thirds of the time; that the chairs and stools furnished them by said firm are comfortable and easy and that they have never noticed any ill effects from working. The only effect they have noticed has been that they got tired occasionally, but that is a matter common to every occupation.

VIII.

They show unto the court that in the manufacture of said boxes in their department, as hereinbefore referred to, there are eleven distinct operations which it is necessary to go through, namely,

1. Shaping the covers of said boxes.
2. Putting the label on the inside of the cover.
3. Pasting black trimmings on the corners and edges.
4. Pasting paper on the top.
5. Pasting paper on the side.
6. Pasting paper on the bottom of the box.
7. "Cornering the box" which is pasting trimming on the corners of the box.
8. Trimming the bottom.
9. Pasting paper on the outside of the bottom.
10. Pasting paper on the side.
11. Pasting lining in the box.

And that during the year they average about a hundred boxes of this kind a week, which it is necessary for them to do in connection with their other work.

IX.

The complainants show unto the court that the said factory wherein the said co-complainants, Anna Kusserow and Dora Windeguth, are employed is well lighted, sanitary and wholesome throughout; that the toilet facilities in said building are the best of their kind; that said building is about five stories in height and contains about thirty-five toilets and that the said W. C. Ritchie & Company employ a scrub woman whose sole duty is to clean out the toilets, sinks and floor around the same and that said building is constantly in a clean and sanitary condition throughout, through the efforts of other employes charged with the duty of keeping the same wholesome and clean.

X.

The complainants further show unto the court that said firm furnishes to its employes luncheon facilities for keeping their lunch warm and that they are well satisfied with said arrangement and that said firm also has medical facilities of which those suffering from headaches or similar ailments may avail themselves, and may also consult a doctor when necessary, and that said facilities are extended to the employes for the sake of establishing a more cordial and closer relationship between said employer and employes.

XI.

They further show unto the court that the system in force in said factory is to make the female employes have regular working uniforms of calico, which are kept in the factory and put on every day at work and that one of the rules of said factory is to have said costumes taken home at least once a week and thoroughly washed.

XII.

They further show unto the court that said co-complainant W. C. Ritchie & Company employs altogether about one thousand people of which three-fourths are females and that fifteen per cent. of said employes have been in the employ of said firm for from ten to thirty-five years each, and that said firm maintains boxes for complaints of employes and for suggestions of the same, which has resulted in the establishment of complete and open confidence between the parties, and that the complainants herein show unto the court that so far as they know as the result of conversation with the other employes, that all of the employes are well satisfied with the treatment accorded by said firm and the facilities afforded by it.

XIII.

The co-complainant Anna Kusserow respectfully shows unto your Honors that she is the head of a family consisting of ~~five~~ ^{seven} members, to-wit, her ~~mother~~, father, brother, sister and self, and the co-complainant, Dora Windeguth, shows that she is the head of a family consisting of her sister and herself, and these complainants respectfully

show unto the court that the members of their families are dependent upon them for support and that they are glad of a chance to work overtime and earn more money and that they welcome such opportunities and have grown to depend upon them and to adjust their household and living expenses in accordance therewith, so that if they are not allowed to work for more than ten hours a day they will be compelled to run into debt to maintain their households and be deprived of wages which they would otherwise earn and of property which they would otherwise acquire and thus be irreparably damaged.

XIV.

Your orator, W. C. Ritchie & Company, shows unto your Honors that it employs in its respective factories about seven hundred and fifty females and that ninety per cent. of the same are what is called skilled help.

XV.

It further shows that there is employed in the whole State of Illinois approximately fifteen hundred females in the paper box business and that during what is known as the rush season, as hereinafter shown unto your Honors, the facilities of the paper box manufacturers, in spite of the most improved methods of manufacture and the utmost diligence in securing help, is in such condition that it is impossible for them to comply with their orders and to fill the demands of their customers without causing their employes, at times, to work longer than ten hours a day.

XVI.

It shows unto the court that in accordance with the provisions of the Ten Hour Law, as hereinafter shown unto your Honors, it has made an effort to get more employes and has posted up the following notice in its factory and announced the same to its employes:

"As experience has shown us that we obtain better results with new employes, who are brought in by our own people rather than by hiring anyone who applies for work, we are going to give from now on One Dollar (\$1.00) for each person brought in by one of our employes; providing that person stays two months with us. This offer is open to men, girls and boys, at our South Green street Factory only.

"When you have a friend who would like to stay with us notify your forewoman, foreman or Mr. Traver and you will be told when there is a vacancy that your friend can have and you will receive your dollar after your friend has been with us two months.

"When we hire anyone that you bring in, report it to your forewoman or foreman, who will see that you are given credit for the person you brought.

"As an extra inducement to all our employes to get their friends to work for us, we are going to offer a gold watch to the person that brings in the largest number of people whom we may hire between now and October 25th; providing that the people we hire stay until the last Saturday before Christmas. Second and third prizes will also be given. This is in addition to the One Dollar that we are going to give for each new employe brought in.

"W. C. RITCHIE & COMPANY,

"By W. E. RITCHIE,

Pres.

"Aug. 2nd, 1909."

And shows unto the court that said notice was given to about five hundred employes on the second day of August,

date up to

A. D. 1909, and that since^a the filing of this bill less than fifteen persons have been presented for its consideration, although it is informed and believes and so states the fact to be, that its employes have done their utmost to comply with said notice.

XVII.

The complainants respectfully show unto the court that at certain periods of the year there arises a great and unusual demand from the various lines of business hereinafter specifically referred to for the output of your orator, W. C. Ritchie & Company and that during such periods of the year there is a great and extraordinary influx of orders and that said periods of the year are what are commonly known as the "rush seasons" and arise through the fact that extensive preparations are made for the fall and holiday trade by lines of business that are great users of paper boxes; that it is impossible for your orator to anticipate such demand inasmuch as the demands of business during such period fix the conditions of labor and that it is impossible for your orator to forecast which of its customers will order a larger quantity of goods than usual and what style of box its various customers will desire certain quantities of and further show unto the court that it is impossible for its customers to forecast this, inasmuch as their demand for boxes is limited by the conditions of the trade at that particular time and that these conditions are variable and dependent upon circumstances over which its customers have no control. For instance, your orator is a large manufacturer of cigarette boxes and that during the discussion on the tariff bill recently enacted by the Congress of the United States its orders for cigarette boxes were not uniform and were

below the normal until the questions presented in said *tariff discussion had been settled and that when said bill was finally enacted your orator received an extraordinary amount of orders, which had been delayed pending said proceedings.* Your orator further shows that it is accustomed to receive each year orders from the Board of Election Commissioners for the paper ballot boxes in which ballots are delivered to the clerks of election and that said Board of Election Commissioners does not place said order until a short time before said boxes must be delivered and that said co-complainants, Anna Kusserow and Dora Windeguth, are generally the employes who manufacture said boxes and that to comply with said order it is necessary for them to work longer than ten hours a day and that your orator, W. C. Ritchie & Company, is wholly without power or authority or influence to compel said Board of Election Commissioners to place said order with them at such time as to give them any further time in which to prepare for the same, and that there are always various circumstances which arise in addition to the demands of business and conditions of trade, such as design and fashion of boxes, etc., which renders it impossible for your orator to at all anticipate the amount or character of orders which it will be obliged to fill.

XVIII.

Your orator, W. C. Ritchie & Company, further shows unto your Honors that the lines of business which are particularly dependent upon the output of your orator during said "rush seasons" are the jewelry, candy, suspender, millinery, chewing gum, perfumery, hose supporters, neck wear, fountain pens, medical preparations,

silverware, soap, talcum powder and coffee, and that during said "rush seasons" the orders from the lines of business enumerated exceed by more than twenty-five per cent. the volume at any other time during the year and that in order to get said goods out promptly, in accordance with the contracts which are made thereupon contingent, it is necessary to swell the normal work of certain departments in your orator's factory in what are known for instance as the glue workers and the wrapping machine departments as much as fifty per cent. and that it is impossible for your orator to do so other than by running its factory longer than ten hours a day and having its employes therein employed work for longer than ten hours a day, and that if it is not permitted to have its female employes, as well as its male employes, work for longer than ten hours a day during such rush season that its business will be irreparably damaged.

XIX.

Your orator shows unto your Honors that business begins to increase in the month of August and that from the beginning of September the said "rush seasons" have commenced and that said "rush seasons" continue until after the Christmas and New Year holidays and that it then begins to quiet down for a few weeks and starts in again about the 15th of February and lasts for about 8 weeks thereafter; that altogether said "rush seasons" comprise about six months of the year, and that the demands of business during such "rush seasons" fix the conditions of work of the employes and that it is wholly beyond the power and control of your orator to in any

way anticipate the demands of its customers for such period.

XX.

Your orator further shows unto your Honors that the contracts which it makes for the delivery of its product are made on condition of prompt delivery on various dates and that it will be impossible for your orator, W. C. Ritchie & Company, to comply with its contracts during the "rush season" unless the females in your orator's establishment are permitted to work for longer than ten hours a day during such season.

XXI.

Your orator further shows unto your Honors that its business was established in A. D. 1866 and has been continuously in operation since then and that the business records of your orator show that the allegations in paragraphs XVII, XVIII, XIX and XX of this bill are established facts and matters of business experience.

XXII.

That during the said period of time in which your orator, W. C. Ritchie & Company, has been engaged in business and the period of time during which its predecessors, to whose rights and liabilities it succeeded, has been in business it has built up its business under and in accordance with the laws of the State of Illinois, which have always heretofore placed the female on an equality with the male in her right to acquire property and to enjoy the fruits thereof and to work and use and employ the results of her labor and make contracts in reference there-

to as she might see fit and that it would be absolutely impossible for your orator and for others similarly situated to adjust its business in such a way as to comply with said Ten Hour Law.

XXIII.

The complainants further show that unless the said defendants are restrained from enforcing said Ten Hour Law numerous prosecutions will be instituted thereunder against your orators, W. C. Ritchie & Company and Wm. E. Ritchie, resulting in a vast multiplicity of suits, and that therefore your orators, W. C. Ritchie & Company and W. E. Ritchie are remediless save in a court of equity.

XXIV.

Your orator, W. E. Ritchie, shows unto the court that he is the president and general manager of W. C. Ritchie & Company, an Illinois corporation, one of the complainants herein, and charged with the control and the duty of managing the plants of said W. C. Ritchie & Company, and shows unto the court that with the knowledge and consent of said W. C. Ritchie & Company, he has recently allowed an adult female of the age of more than eighteen years to work in the factory of said W. C. Ritchie & Company for longer than ten hours a day, wherefore said Edgar T. Davies as chief factory inspector of the State of Illinois, aided and abetted by said John E. W. Wayman as state's attorney for Cook County, Illinois, have combined and confederated together to deprive your orator, W. C. Ritchie & Company, of its property without due process of law and to deprive and confiscate the constitutional right of

your complainants, Anna Kusserow and Dora Windeguth, to labor, and your orator is informed have taken out warrants for the prosecution of your orator, W. E. Ritchie.

XXV.

The complainants further show unto your Honors that there went into effect on the first day of July, A. D. 1909, a law duly passed by the legislature of the State of Illinois, and that the same is commonly known as the Ten Hour Law and that the said law is in words and figures as follows, to-wit:

“An Act to regulate and limit the hours of employment of females in any mechanical establishment, or factory or laundry in order to safeguard the health of such employes; to provide for its enforcement and a penalty for its violation. ✕

“Section 1. *Be it enacted by the People of the State of Illinois represented in the General Assembly:* That no female shall be employed in any mechanical establishment or factory, or laundry in this state, more than ten hours during any one day. The hours of work may be so arranged as to permit the employment of females at any time so that they shall not work more than ten hours during the twenty-four hours of any day.

“Section 2. Any employer who shall require any female to work in any of the places mentioned in Section 1 of this Act, more than the number of hours provided for in this Act, during any day of twenty-four hours, or who shall fail, neglect or refuse so to arrange the work of females in his employ that they shall not work more than the number of hours provided for in this Act, during any one day, or who shall permit or suffer any overseer, superintendent or other agent of any such employer to violate any of the provisions of this Act, shall be guilty of a misdemeanor and upon conviction thereof shall be fined

for each offense in a sum of not less than \$25 or more than \$100.

"Section 2. The state department of factory inspection shall be charged with the duty of enforcing the provisions of this Act, and prosecuting all violations thereof.

"Section 4. All Acts and parts of Acts in conflict herewith are hereby repealed."

That the said law, as is seen by reference thereto, prohibits any female employe from working more than ten hours in any one day or any employer from employing any female for any longer period in any one day than ten hours, provided such employer or employe are engaged in any business classified by said Act as "mechanical establishment, or factory or laundry."

XXVI.

Your orator, W. C. Ritchie & Company, shows unto your Honors that it operates a factory and has now on hand contracts which must be filled promptly to enable its customers to comply with their requirements for the fall trade, and that to fill such orders it is necessary that its employes, male and female, work longer than ten hours a day, and that if they are not permitted to do so certain of its contracts will be cancelled and its business irreparably damaged.

XXVII.

The complainants further show that said defendant Wayman is state's attorney for Cook County, Illinois, and charged with the enforcement in said Cook County of the statutes of this state.

XXVIII.

Your complainants further show that said defendant Davies is the chief factory inspector for the State of Illinois and charged with the duty of enforcing said Ten Hour Law and has combined and confederated together with said defendant, Wayman, and taken out warrants with his connivance for prosecution against your orators, William E. Ritchie and W. C. Ritchie & Company, for the penalties provided in said Act.

XXIX.

The complainants, Anna Kusserow and Dora Windeguth, show unto your Honors that they receive regular wages for their work during the day and for extra time they put in at night they are paid extra and that they are willing and anxious to work more than ten hours a day during the "rush seasons" and that if they are not permitted to do so, they will be deprived thereby of earning a living, to their irreparable injury; and that they are informed and believe as a result of their experience and conversation with the other employes that all of the employes by the co-complainant, W. C. Ritchie & Company, are willing and anxious to work longer than ten hours a day during said "rush seasons" and that said W. C. Ritchie & Company is willing to employ them for such period in said "rush seasons," with the exception of those employes who are under sixteen years of age.

XXX.

The complainants further show that said Ten Hour Law is void and unconstitutional and totally invalid in that:

(a) It violates Section 2 of Article II of the Constitution of 1870 of the commonwealth of Illinois, as it deprives citizens of liberty and property without due process of law.

(b) It is an illegal restriction upon the right of the people to contract, as it prohibits both employer and employe from employing or being employed for longer than ten hours in any one day.

(c) It takes away the constitutional right of the individual to contract.

(d) It is unequal, discriminatory and unjust and purely class legislation, as there exists no reason why said Act should apply to the business of your complainants and not to the business of all others in this state.

(e) It is a purely arbitrary restriction upon the fundamental rights of some of the citizens of this commonwealth to control their own time and faculties, as it substitutes the judgment of the legislature for the judgment of the employer and employe in a matter about which they are competent to agree with each other.

(f) It interferes with the inherent and inalienable right of the citizen to make private contracts.

(g) It is contrary to the police power of the state.

(h) It is void for ambiguity, as the term "mechanical establishment" is ambiguous and of purely comparative significance.

(i) It violates Section 14 of Article II of the Constitution of 1870.

(j) It is unequal in its operation, for it imposes a penalty on the employer and imposes no penalty on the employe for precisely the same offense.

(k) It is unequal, discriminatory and unjust because it restricts an employe from working more than ten hours a day no matter if she may be employed in more than one establishment.

(l) It is void because beyond the power of the legislature to enact.

Forasmuch, therefore, as the complainants herein have no adequate recourse or remedy save in a court of equity, where matters of this kind are properly adjudicated, and to the end that said defendants, John E. W. Wayman as state's attorney for Cook County and Edgar T. Davies as chief factory inspector for the State of Illinois may, if they can, show why your complainants should not have the relief hereby prayed, and to the best and utmost of their knowledge, remembrance, information and belief, full, true, direct and perfect answer make to the matters and things hereinbefore stated and charged, but not under oath, every and each of their answers under oath being hereby expressly severally waived, and to the end that said complainants, Anna Kusserow and Dora Windeguth, may be allowed their constitutional and fundamental right to sell their labor and make contracts therefor, for the support and preservation of their families and in the exercise of their right under the Constitution of this state to life, liberty and the acquisition of property, and

that the said co-complainants, W. C. Ritchie & Company and William E. Ritchie, may be secured in their persons against unlawful and illegal trespasses, searches and seizures and have the liberty to acquire and enjoy their property and not to be deprived of the same without due process of law, and to be only subjected to laws which are equal and just in their operation, and to the end that said Ten Hour Law be declared by your Honors unconstitutional and void, and that the said defendants, John E. W. Wayman as state's attorney for Cook County, Illinois, and Edgar T. Davies as chief factory inspector of the State of Illinois, be immediately enjoined and restrained by a decree of this Honorable Court to absolutely refrain and desist from enforcing against the complainants said Ten Hour Law or any of its provisions and for such other and further relief in the premises as to your Honors shall seem meet and consistent with the ends of justice:

May it please your Honors to grant unto the complainants the people's writ of injunction to be directed to said John E. W. Wayman as state's attorney for Cook County and said Edgar T. Davies as chief factory inspector for the State of Illinois and Cook County, ordering and compelling them to desist and refrain from enforcing said Ten Hour Law or any of its provisions against your complainants.

And may it please your Honors to grant the writ of summons in chancery directed to the sheriff of Cook County of Illinois, commanding him to summon the defendants, said John E. W. Wayman as state's attorney for Cook County and said Edgar T. Davies as chief factory inspector of the State of Illinois and Cook

County, to appear before said court on the first day of the September term, A. D. 1909, to be held at the court house of said court in the City of Chicago in said Cook County and then and there to answer this bill.

And your complainants will ever pray, etc.

W. C. RITCHIE & COMPANY,

WILLIAM E. RITCHIE,

ANNA KUSSEROW,

DORA WINDEGUTH,

Co-Complainants.

By Haynie & Lust
Their Solicitors.

Mr. Rufus Haynie,
Of Counsel.

STATE OF ILLINOIS, }
 COUNTY OF COOK. } ss.

William E. Ritchie, being first duly sworn, on oath says that he is president of W. C. Ritchie & Company, a co-complainant herein; that he has read the foregoing bill of complaint and knows the contents thereof and is personally familiar with the facts and things therein charged and stated and is authorized to make this affidavit on behalf of said co-complainant, W. C. Ritchie & Company, and that the matters and things in said bill of complaint alleged and stated are true, except as to the matters and things therein stated to be on information and belief, and as to those matters he believes said bill of complaint to be true.

William E. Ritchie

Subscribed and sworn to before me this 3 day
 of West, A. D. 1909.

T. S. Trethewell

Notary Public.

(Seal)

W. E. R.

STATE OF ILLINOIS, }
COUNTY OF COOK. } ss.

William E. Ritchie, being first duly sworn, on oath says that he is one of the co-complainants hereinbefore mentioned in this bill of complaint; that he has read the foregoing bill of complaint and knows the contents thereof and is personally familiar with the facts and things therein charged and stated and that the matters and things in said bill of complaint alleged and stated are true, except as to the matters and things therein stated to be on information and belief, and as to those matters he believes said bill of complaint to be true.

William E. Ritchie

Subscribed and sworn to before me this 3 day of Sept, A. D. 1909.

T. S. Tridwell
Notary Public.

Seu

STATE OF ILLINOIS, }
COUNTY OF COOK. } ss.

Anna Kusserow, being first duly sworn, on oath says that she is one of the co-complainants hereinbefore mentioned in this bill of complaint; that she has read the foregoing bill of complaint and knows the contents thereof and is personally familiar with the facts and things therein charged and stated and that the matters and things in said bill of complaint alleged and stated are true, except as to the matters and things therein stated to be on information and belief, and as to those matters she believes said bill of complainant to be true.

Anna Kusserow

Subscribed and sworn to before me this 3 day
of Sept, A. D. 1909.

T. S. Tedwell
Notary Public.

Lee

28

STATE OF ILLINOIS, }
 COUNTY OF COOK. } ss.

Dora Windeguth, being first duly sworn, on oath says that she is one of the co-complainants hereinbefore mentioned in this bill of complaint; that she has read the foregoing bill of complaint and knows the contents thereof and is personally familiar with the facts and things therein charged and stated and that the matters and things in said bill of complaint alleged and stated are true, except as to the matters and things therein stated to be on information and belief, and as to those matters she believes said bill of complaint to be true.

Dora Windeguth

Subscribed and sworn to before me this 9 day
 of Sept, A. D. 1909.

J. S. Tedwell

Notary Public.

See