

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
DANVILLE DIVISION

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
v.)	
)	
JESSE W. WILLIAMS, SHERIFF)	CIVIL ACTION
OF PATRICK COUNTY, a Constitu-)	NO. 83-0094-D
tional Officer of the Common-)	
wealth of Virginia and)	
Elected under the Laws of the)	
Commonwealth,)	
)	
Defendant.)	
)	
)	

ANSWERS OF PLAINTIFF UNITED STATES TO
DEFENDANT'S FIRST SET OF INTERROGATORIES
AND REQUEST FOR PRODUCTION OF DOCUMENTS

Plaintiff United States, by and through its undersigned counsel, hereby responds to Defendant's First Set of Interrogatories and Request for Production of Documents as follows:

INTERROGATORY NO. 1

The Plaintiff, United States of America, has alleged in paragraph 7 of its Complaint, that the Defendant, Sheriff of Patrick County, has engaged and continues to engage in employment practices that discriminate against women and that deprive or attempt [sic] to deprive women of employment as sworn officers in the Patrick County Sheriff's Department.

With regard to each female applicant who the Plaintiff alleges to be the victim of such discrimination, please set forth the following information:

a. If the Plaintiff's claim [is] that a woman, on initial hiring with the Defendant, was assigned to an inappropriate position because of discrimination on the basis of sex, please set forth the following information:

(1) the position or positions which she believes she should have been assigned;

(2) her qualifications for such position or positions;

(3) whether she expressed an interest in any of the positions;

(4) the names and positions of persons involved [In responding to this and subsequent subparagraphs, the terms "persons involved" or "personnel involved" shall be defined to include the immediate supervisors or any other individual responsible for an employment decision and any other individual who would have direct evidence of the alleged claim. The terms shall also include any individual who benefited from the employment action complained of (eg., the person subsequently assigned to the position Plaintiff claims was wrongfully denied)]; and

(5) any additional facts to provide a complete statement of each and every claim.

ANSWER TO INTERROGATORY NO. 1

The United States, based upon its investigation and discovery conducted to date, has identified three women who the United States contends have been individual victims of such unlawful discrimination in employment: Wanda Hylton, Stephanie Gregory Ressel and Doris Scales. Our answers with respect to each of these women are as follows.

ANSWER TO INTERROGATORY NO. 1a

This Interrogatory and its subparts are only applicable to Wanda Hylton, as neither Doris Scales nor Stephanie Gregory Ressel was ever hired by the Sheriff.

ANSWER TO INTERROGATORY NO. 1a(1)

Wanda Hylton went to the Patrick County Sheriff's Department (hereinafter the "PCSD") on March 25, 1981, and asked Betty Martin, the defendant's secretary, for an application for employment in the PCSD, which she was then given (Deposition of Wanda Hylton taken by the United States on 12/2/83, pp. 15-16). At the time that she requested an application, Ms. Hylton also asked Ms. Martin that she be permitted to speak to Sheriff Williams (Hylton Dep., p. 15). The Sheriff immediately conducted a one-half hour interview of Hylton, during which the Sheriff and Ms. Hylton discussed, inter alia, Ms. Hylton's college degree, her course work in criminology and her career plans. During this interview, Ms. Hylton asked the Sheriff whether he would consider hiring a woman as a deputy (Hylton Dep., p. 16). According to Ms. Hylton, the Sheriff responded to her question "by chuckling and saying that he would not hire a woman in his department as a deputy, that he did not think that women could handle the job, that they could not handle the men" (Hylton Dep., p. 17). Later in this interview, the Sheriff asked Ms. Hylton whether she would be interested in a dispatcher's job, and she replied that she would be interested "in a dispatcher's job or any other job" (Hylton Dep., pp. 17-18). Ms. Hylton achieved a score of 94 on the written examination (Govt. Ex. 77 attached to Williams Dep. 8/11/83), and subsequently was hired as a dispatcher in the PCSD on April 16, 1981 (Hylton Dep., p. 18).

The United States contends that at the time of Ms. Hylton's application for employment with the PCSD, as well as at all times subsequent thereto, Ms. Hylton was qualified for hire or assignment as a deputy sheriff (ie, road deputy, courtroom security officer or a corrections officer) but was unlawfully denied consideration for that position because of her sex.

ANSWER TO INTERROGATORY NO. 1a(2)

Please refer to Govt. Ex. No. 77 (Hylton's application) attached to the Deposition of Jesse W. Williams, taken by Plaintiff United States on 10/12/83, and to the Deposition of Wanda Hylton, pp. 13-14, 20-24 and 26-30).

ANSWER TO INTERROGATORY NO. 1a(3)

Yes. Please refer to our Answer to Interrogatory No. 1a(1), supra.

ANSWER TO INTERROGATORY NO. 1a(4)

Please refer to our Answer to Interrogatory No. 1a(1), supra. In addition, subsequent to Ms. Hylton's March 25, 1981 application for employment with the PCSD, the following persons were hired or assigned on the dates indicated to deputy sheriff positions (road deputy, courtroom security officer and corrections officer) for which the United States contends Ms. Hylton was qualified but was unlawfully denied consideration:

<u>Name</u>	<u>Job Action</u>	<u>Date</u>	<u>Job Title</u>
Morse, David L.	assigned	7/1/81	Courtroom Security Officer
Sehen, John	assigned	7/1/81	Road Deputy
Bridges, Michael	assigned	7/1/81	Corrections Officer
Pendleton, Bruce A.	hired	8/1/81	Road Deputy
Jones, Terry L.	hired	10/1/81	Road Deputy
Bowman, Claude F.	hired	2/1/82	Corrections Officer
Joyce, Douglas W.	assigned	2/16/82	Corrections Officer
Tatum, Steve J.	assigned	3/1/82	Corrections Officer
Sheppard, Katherine N.	assigned	8/1/82	Civil Process Server
Bowman, Claude F.	assigned	8/1/82	Road Deputy
Nowlin, Kenneth C.	hired	8/16/82	Corrections Officer
Shockley, Darrell K.	hired	9/1/82	Corrections Officer
Smith, Darrly C.	hired	9/16/82	Corrections Officer
Hubbard, David E.	hired	10/1/82	Corrections Officer
Gregory, Thomas D.	assigned	12/16/82	Courtroom Security Officer

ANSWER TO INTERROGATORY NO. 1a(5)

Please refer to our Answers to Interrogatory Nos. 1a(1)-(4), supra, as well as to the Deposition of Wanda Hylton.

INTERROGATORY NO. 1b

State, in specific detail, what prompted her to apply for employment with Defendant; the name and job title of the individual, or, where no individual was specified, the name of the office, to which any letter, telephone call, or visit connected with an application for employment was addressed; the position or positions for which she applied; and the name and job title of any individual who interviewed her for employment.

ANSWER TO INTERROGATORY NO. 1-b

WANDA HYLTON

Wanda Hylton was prompted to apply for employment with the PCSD because she was very interested in law enforcement, she needed a job and wanted one that was compatible with her education (a B.S. degree in Sociology and Criminology) and she considered Patrick County to be her home. For the remainder of this Interrogatory with reference to Wanda Hylton, please refer to our Answers to Interrogatory Nos. 1a(1)-(3), supra.

STEPHANIE GREGORY RESSEL

Stephanie Gregory Ressel applied for employment with the PCSD on June 3, 1980. On that date, Ms. Ressel went to the PCSD seeking employment as a deputy sheriff, because she wanted a career in law enforcement. At that time, Ms. Ressel had a B.S. degree with a major in Psychology and Sociology and a minor in Criminal Justice, and had worked for one month as an intern in the Harrisonburg Police Department while attending college.

At the PCSD on June 3, 1980, Ms. Ressel asked for and was provided an application, which she then proceeded to fill out on the booking table in front of the office. After she had filled out the application, Ms. Ressel gave it to one of the two male deputies who had been standing near the dispatcher's desk, Jay Gregory or Larry Baliles, and Ms. Ressel asked that deputy to make sure that her application was given to the Sheriff or other appropriate person. The deputy looked at the application and noted that Ms. Ressel had not filled out the line on the appli-

cation asking what position was being applied for. Ms. Ressel responded that she really did not want to put down a specific job, because she did not know what jobs were open and, further, that she did not know the correct terminology for each job classification within the PCSD. The deputy then told Ms. Ressel that the only opening the PCSD then had was for deputy "and he [the Sheriff] ain't going to hire no woman." Notwithstanding the deputy's admonition that the Sheriff would not hire women as deputies, Ressel wrote 'deputy' in the blank space provided on the application for name of position being sought, and submitted her application. Later that afternoon she received a call at home from a woman identifying herself as the Sheriff's secretary, who informed Ms. Ressel that the Sheriff wanted to meet with her at 8:00 the following morning, June 4, 1980.

On her arrival at the PCSD the following morning, the Sheriff gave Ms. Ressel a one and a one-half hour written examination which he graded immediately upon completion. She passed this exam with a score of 86. The Sheriff then interviewed Ms. Ressel for approximately one-half hour. During the interview, the Sheriff explained that the position he had open was for a courtroom security officer and he explained to her the job's duties and responsibilities, as well as the procedure for buying uniforms and being issued a gun, holster and belt. The Sheriff also told Ms. Ressel that in order for her to be hired, she would have to move from Martinsville, where she then lived, into Patrick

County. Ms. Ressel assured the Sheriff that it would be no problem for her to move into Patrick County. At the conclusion of this interview, the Sheriff assured Ms. Ressel that he would contact her by the middle of the following week (June 5-11) to advise her of his decision concerning her application.

Immediately following her interview with the Sheriff on June 4, 1980, Ms. Ressel advised her uncle of her interview and of her need to move into Patrick County. Her uncle went to Patrick Springs that same day and located a place for her to rent.

After a week passed without hearing from the Sheriff, Ms. Ressel telephoned him at the PCSD. During this telephone call, the Sheriff told her that he had hired someone else. A few days after this conversation, Ms. Ressel received a letter informing her that she had not been selected for the position.

In his August 11, 1983 deposition, the Sheriff testified that he did not hire Stephanie Ressel because "she was very --she was overqualified for the position by far" and "[s]he had much more potential to develop somewhere else than she could have here in her field" (Williams Dep. 8/11/83, pp. 227). The Sheriff further mentioned that the person he selected for the position instead of Ms. Ressel had "family ties with the county" (Id.). However, so also does Ms. Ressel. Her family has lived in Patrick County for several generations. Her grandmother, Alma Hundley Coleman, and her great uncle, Thomas Coleman, still live on the family farms in the Moorefield Store Community of the County, and Ms. Ressel has many more family members who live in the County. Indeed, Ms. Ressel was married in downtown Stuart, in the park

behind the First National Bank. Moreover, the record reflects that in March 1980, the Sheriff offered a deputy sheriff position to David N. Pleasants, even though Mr. Pleasants was at the time of that offer a resident of Greensboro, North Carolina (Govt. Exs. 6 and 20 attached to Williams Dep. 8/11/83).

The United States contends that at the time of her application for employment with the PCSD, and at all times subsequent thereto, Ms. Ressel was qualified for appointment as a deputy sheriff in the PCSD (ie., road deputy, courtroom security officer or corrections officer), but was unlawfully denied appointment to that position on the basis of her sex.

DORIS SCALES

On a Saturday morning, in approximately mid-April 1980, Doris Scales ran into Clifford Boyd, a deputy sheriff and shift supervisor in the PCSD, at a restaurant called Boyd's Restaurant in Arrat, Virginia. On that occasion, Ms. Scales asked Mr. Boyd if there were any job openings in the PCSD. Mr. Boyd replied that there were two deputy sheriff positions open, and he suggested that she put her application in. Mr. Scales asked Mr. Boyd if she could use his name as a reference, and he told her that she could.

On the following Monday morning, Ms. Scales telephoned Sheriff Williams, informed the Sheriff that Mr. Boyd told her there were deputy sheriff openings and inquired as to whether what Mr. Boyd told her was correct. The Sheriff told Ms. Scales that he had two deputy openings but that he would not hire her as a deputy. The Sheriff went on to say that he did not intend to hire any

women as deputies then or in the near future. Ms. Scales asked if she could come to the PCSD and fill out an application anyway. The Sheriff told Ms. Scales that she could fill out an application, but again pointedly told her, "I will not hire you for a deputy." When Ms. Scales then asked what she would have to do in order to be appointed as a deputy, the Sheriff told her that she would have to take a three hour police exam, have good employment and personal references, and pass a background check. This conversation lasted less than five minutes.

One or two days later, Ms. Scales went to the PCSD and asked Thomas Gregory, who at the time was a deputy sheriff in the PCSD assigned as a corrections officer, if she could be permitted to talk to the Sheriff. Mr. Gregory went and got the Sheriff. After the Sheriff and Ms. Scales exchanged preliminary greetings, Ms. Scales requested an application. The Sheriff again told her that she could submit one, but that he had no plans then or in the near future to hire any women. Ms. Scales nevertheless again requested that the Sheriff give her an application. The Sheriff gave Ms. Scales an application which she took home to fill out. This conversation again lasted less than five minutes.

A couple of days later, on or about April 22, 1980, Ms. Scales returned the completed application to the PCSD. While at the PCSD that day, Ms. Scales asked Mr. Gregory to be allowed to see the Sheriff. The Sheriff came out into the front room of the PCSD to speak with Ms. Scales. Ms. Scales explained to the Sheriff that she had brought back her application and wanted to take

the written exam that day. The Sheriff told her that he would have to schedule her to take the exam in about two weeks, and that he would call her. He again reiterated that he was not going to hire any women. Ms. Scales and the Sheriff spoke for only two minutes, at most.

On or about April 27, 1980, Ms. Scales again went to the PCSD and asked Mr. Gregory for permission to see the Sheriff. The Sheriff took Ms. Scales to a desk in an inside room, in front of the desk of his secretary, Betty Martin. He told Ms. Martin to give Ms. Scales an exam. No one read any exam instructions to Scales. Ms. Scales completed the exam in approximately 2 to 2 1/2 hours and, upon completion, she asked the Sheriff whether it could be graded immediately. The Sheriff said that he had no time to grade it then, as he was leaving in a minute to go out of town. Ms. Scales then gave the Sheriff the letters of recommendation she had brought with her, which were from: Elbert Sutphin, superintendant, Oakdale Knitting; Merle Childress, also from Oakdale Knitting; Sherman Hubbard, from J.P. Stevens; and personal references from Mr. Nick Epperson, Mr. Roy Large, and Mrs. G.E. Brown.

In an effort to learn her exam score, Ms. Scales subsequently called the PCSD three or four times, but was always told that the Sheriff was out of town.

Approximately a week after she took the exam, Ms. Scales reached the Sheriff by telephone. The Sheriff told her that her exam score was 90, that her references from former employers and

community people were good, and that there was nothing in her background which would prevent him from hiring her. However, the Sheriff reiterated that he had no plans then or in the future to hire any women as deputies, because that was "not a suitable job for a woman." The Sheriff went on to say that there would be the possibility of some dispatcher's jobs in a few months, and Ms. Scales told the Sheriff that she was also interested in a dispatcher job. This conversation lasted only two or three minutes.

That same day, Ms. Scales called Lawrence Burton, the Commonwealth's Attorney, and reported that the Sheriff had told her he would not hire women as deputies. Mr. Burton told Ms. Scales that he had seen her at the PCSD and had thought that she was working for the PCSD. Mr. Burton subsequently called Ms. Scales back, told her that he had telephoned the Sheriff and told her that during that telephone conversation the Sheriff confirmed that he thought it was not a woman's place to be a deputy. Mr. Burton told Ms. Scales that, after talking to the Sheriff, he thought that he agreed with the Sheriff's position, since deputies might have to go out at night and into old, dark buildings.

By letter dated June 18, 1980, the Sheriff informed Ms. Scales that she had not been selected for a position in the PCSD. After she received that letter, Ms. Scales called the Sheriff because she wanted to know why she had not been hired. The Sheriff told her that she "did not meet our needs."

INTERROGATORY NO. 1-c

Whether she claims that she was hired at a lower level position and consequently received a lesser salary and opportunity for promotion than men with equal qualifications? If so, provide the following information separately for each and every such claim:

- (1) the names and job titles of the men involved;
- (2) a detailed comparison of her qualifications with those of the men involved;
- (3) the name and job title of the individual(s) responsible for her initial assignment;
- (4) any other personnel involved; and
- (5) any additional facts to provide a complete statement of each and every claim.

ANSWER TO INTERROGATORY NO. 1c

This Interrogatory and its subparts are applicable only to Wanda Hylton, as neither Doris Scales nor Stephanie Gregory Ressel was hired by the Sheriff.

The United States contends that at the time of Ms. Hylton's application for employment with the PCSD, as well as at all times subsequent thereto, Ms. Hylton was qualified for hire or assignment as a deputy sheriff but was unlawfully denied consideration for that position because of her sex.

ANSWER TO INTERROGATORY NO. 1c(1)

Since January 1, 1980, the Sheriff hired thirty-one (31) persons, all of whom have been men, as deputy sheriffs. The name, date of hire and job classification of each of these persons are as follows:

DEPUTY SHERIFF HIRES SINCE JANUARY 1, 1980

<u>Name</u>	<u>Date of Hire</u>	<u>Deputy Classification</u>
* Charles Wright	January 1, 1980	Corrections Officer
* Harry Frizell	January 1, 1980	Road Deputy
Larry Baliles	January 1, 1980	Shift Supervisor
Robert Day, Jr.	January 1, 1980	Road Deputy
Thomas Gregory	January 1, 1980	Corrections Officer
Jay Gregory	January 1, 1980	Road Deputy
D.J. Runge	January 1, 1980	Investigator
Thomas Tatum	January 1, 1980	Road Deputy
Michael Bridges	January 1, 1980	Courtroom Security Officer
Clyde Earles	January 1, 1980	Courtroom Security Officer
* Clifford Boyd	January 1, 1980	Shift Supervisor
* Roger Gray	January 7, 1980	Corrections Officer
* Lester Purdue	January 7, 1980	Road Deputy
* William O. Ring	May 1, 1980	Corrections Officer
* Raymond H. Nicholson	June 1, 1980	Corrections Officer
* Elmer L. Sehen	June 16, 1980	Road Deputy
* Bradford P. Roane	July 1, 1980	Road Deputy
* Danny Stacy	July 1, 1980	Road Deputy
Owen Issacs	September 17, 1980	Road Deputy
John Sehen	October 1, 1980	Corrections Officer
* Bruce A. Pendleton	August 1, 1981	Road Deputy
* Terry L. Jones	October 1, 1981	Road Deputy
* Claude F. Bowman	February 1, 1982	Corrections Officer

* Kenneth C. Nowlin	August 16, 1982	Corrections Officer
* Darrell K. Shockley	September 1, 1982	Corrections Officer
* Darryl C. Smith	September 16, 1982	Corrections Officer
* David E. Hubbard	October 1, 1982	Corrections Officer
* David L. Morse	July 1, 1983	Courtroom Security Officer
* Johnny Elgin	July 16, 1983	Corrections Officer
Michael Craig	(UNK), 1983	Corrections Officer

Since January 1, 1980, the Sheriff has hired twelve (12) persons as dispatchers, five (5) of whom have been men and seven (7) of whom have been women. The name and date of hire of each of these twelve (12) persons are as follows:

DISPATCHER HIRES SINCE JANUARY 1, 1980

<u>NAME</u>	<u>DATE OF HIRE</u>
Timmy Rogers	July 1, 1980
Lynne Berquist	July 1, 1980
Douglas Joyce	July 1, 1980
Katherine Sheppard	July 1, 1980
Steven Tatum	April 15, 1981
Wanda Hylton	April 16, 1981
Gail Keith	December 1, 1981
Rhonda Sehen	March 1, 1982
John Bocock	December 16, 1982
Lawrence DeHart	March 16, 1983
Pamela Nowlin	March 16, 1983
Theresa Hubbard	October 1, 1983

Four of the five (5) men hired by the Sheriff as dispatchers since January 1, 1980 were subsequently promoted to deputy sheriff on the dates indicated:

<u>Name</u>	<u>Date of Promotion</u>
* Timmy Rogers	March 16, 1981
* Douglas Joyce	February 16, 1982
* Steven Tatum	March 1, 1982
* John Bocock	April 16, 1982

However, none of the seven (7) women hired by the Sheriff as dispatchers since January 1, 1980 was subsequently promoted to deputy sheriff. Further, while one (1) of these seven (7) women, Katherine Sheppard, was promoted to the job of civil process server on October 1, 1982, that job is not considered by the Virginia State Compensation Board to be comparable to that of deputy sheriff for compensation purposes. Thus, according to the FY 1984 budget for the PCSD approved by the State Compensation Board, Ms. Sheppard's annual salary as civil process server is \$11,144, while John Bocock - who was hired approximately two and one-half years after Ms. Sheppard and who was promoted to deputy more than six (6) months after Ms. Sheppard - has an annual salary of \$11,956.

The United States contends that where, as here, there is evidence of overt, intentional discrimination against women on the basis of their sex, the defendant has the burden of demonstrating by clear and convincing evidence that an individual woman was not the victim of such overt, intentional discrimination. However, notwithstanding this contention and in re-

sponse to this Interrogatory, the United States contends that Ms. Hylton was as qualified or more qualified for deputy sheriff than each of the men whose above set forth name is preceded by an asterisk.

ANSWER TO INTERROGATORY NO. 1c(2)

The qualifications of Wanda Hylton are set forth in her deposition taken by the United States on December 2, 1983, pp. 13-14, 20-24 and 26-30, as well as in Government Exhibit No. 77 attached to the October 12, 1983 Deposition of Jesse W. Williams. The qualifications, or lack thereof, of each of the men whose above set forth name is preceded by an asterisk are set forth in the record as follows:

Charles Wright	Williams Dep. 8/11/83, pp. 144, 146-147, 149-150, 158-160, and Govt. Ex. 61 attached to Williams Dep. 10/12/83.
Harry Frizzell	Williams Dep. 8/11/83, pp. 144, 147, 150, 158-159, and Govt. Ex. 63 attached to the Williams Dep. 10/12/83.
Clifford Boyd	Williams Dep. 8/11/83, pp. 165, 172, 191, 193-195, 198-199, 203-207, Williams Dep. 10/12/83, p. 289 and Govt. Ex. 37 attached thereto. Boyd Dep. 10/12/83, <u>passim</u> .
Roger Gray	Williams Dep. 8/11/83, pp. 204, 205, and Govt. Ex. 38 attached to Williams Dep. 10/12/83. Gray Dep. 11/10/83, <u>passim</u> .
Lester Purdue	Govt. Ex. 70 attached to Williams Dep. 10/12/83.
William O. Ring	Govt. Ex. 72 attached to Williams Dep. 10/12/83.

Raymond H. Nicholson	Williams Dep. 8/11/83, pp. 172-180, 182, 191, 196, 198-199, and Govt. Ex. 40 attached to Williams Dep. 10/12/83.
	Nickolson Dep. 11/10/83, pp. 5-37.
	A.D. Jones Dep. 11/10/83, <u>passim</u> , and Govt. Ex. 1 attached thereto.
Elmer L. Sehen	Govt. Ex. 74 attached to Williams Dep. 10/12/83.
Bradford P. Roane	Govt. Ex. 73 attached to Williams Dep. 10/12/83.
David L. Morse	Williams Dep. 8/11/83, pp. 261-265, and Govt. Ex. 41 attached to Williams Dep. 10/11/83.
Danny Stacy	Williams Dep. 8/11/83, pp. 219-220; and Govt. Ex. 44 attached to Williams Dep. 10/12/83;
	Stacy Dep. 11/10/83, <u>passim</u> , and Govt. Ex. 1 attached thereto;
	Attachment A to Answers to Defendants First Interrogatories.
Bruce Pendleton	Govt. Ex. 47 attached to Williams Dep. 10/12/83.
Terry L. Jones	Govt. Ex. 79 attached to Williams Dep. 10/12/83.
Claude F. Bowman	Govt. Ex. 48 attached to Williams Dep. 10/12/83.
Kenneth C. Nowlin	Govt. Ex. 81-A attached to Williams Dep. 10/12/83.
Darrell K. Shockley	Govt. Ex. 80 attached to Williams Dep. 10/12/83.
Darryl C. Smith	Govt. Ex. 50 attached to Williams Dep. 10/12/83.
David E. Hubbard	Govt. Ex. 51 attached to Williams Dep. 10/12/83.

Johnny Elgin	Williams Dep 10/12/83, pp. 320-322 and Govt. Ex. 55 attached thereto.
Michael Craig	Govt. Ex. 55-A attached to Williams Dep. 10/12/83.
Timmy Rogers	Govt. Ex. 69 attached to Williams Dep. 10/12/83.
Douglas Joyce	Govt. Ex. 42 attached to Williams Dep. 10/12/83.
Steve Tatum	Govt. Ex. 46 attached to Williams Dep. 10/12/83.
John Bocock	Govt. Ex. 52 attached to Williams Dep. 10/12/83.

ANSWER TO INTERROGATORY NO. 1c(3)

The defendant Jesse W. Williams, Sheriff of Patrick County.

ANSWER TO INTERROGATORY NO. 1c(4)

None to the knowledge of the United States.

ANSWER TO INTERROGATORY NO 1c(5)

Please refer to our Answers to refer to Interrogatory Nos.
1a-1c(4), supra.

INTERROGATORY NO. 1d

Whether she claims that she was denied any transfers or promotions on the basis of sex discrimination? If so, provide the following information separately for each and every such claim:

(1) the date each claim first arose and the duration of each such claim;

(2) the names and positions of persons involved including the persons responsible for such denial;

(3) the positions involved;

(4) her qualifications for each such position; and

(5) any additional facts to provide a complete statement of each claim.

ANSWER TO INTERROGATORY NO. 1d

This interrogatory is applicable only to Wanda Hylton as neither Doris Scales nor Stephanie Ressel was hired by the Sheriff. With respect to Wanda Hylton, the information requested in this Interrogatory already has been set forth in our Answer to Interrogatory No. 1c, supra.

INTERROGATORY NO. 1e

Whether at any time during her employment she requested a transfer or promotion to a higher position? If so, provide the following information separately for each and every such request:

- (1) state the date such request was made;
- (2) the name and job title of the person to whom the request was directed;
- (3) in what form it was made;
- (4) the position from which transfer or promotion was requested;
- (5) the position to which transfer or promotion was requested;
- (6) the response to any such request;
- (7) any other personnel involved; and
- (8) any additional details to provide a complete statement of the circumstances.

ANSWER TO INTERROGATORY NO. 1e

This interrogatory is applicable only to Wanda Hylton, as neither Doris Scales nor Stephanie Ressel was hired by the Sheriff.

Wanda Hylton did not request a transfer or promotion to a higher position after she was hired as a dispatcher, because the

Sheriff already had told her when she applied for employment that he would not hire a woman as a deputy, she did not see any prospect of the Sheriff changing his mind from what she observed at the PCSD, and she did not want to do anything that would jeopardize her position as a dispatcher. (Hylton Dep., p. 24). In this regard, Ms. Hylton would have considered continuing her employment with the PCSD instead of resigning - which she did on November 23, 1981 - had she believed that the Sheriff would have considered promoting her to deputy sheriff (Id., at p. 25).

INTERROGATORY NO. 1-f

Whether she claims that she is not receiving, nor received in the past, equal pay as men doing substantially equal work? If so, provide the following information separately for each and every such claim:

- (1) the date each claim first arose and its duration;
- (2) the names of the men allegedly receiving more pay for substantially equal work;
- (3) a description of the work she was doing as well as the work of the above-mentioned men;
- (4) other personnel involved; and
- (5) additional facts to provide a complete statement of each claim.

ANSWER TO INTERROGATORY NO. 1f

No.

INTERROGATORY NO. 1g

Whether she has ever requested an increase in compensation? If so, provide the following information separately for each and every such request:

- (1) indicate the date of each such request;
- (2) the name and job title of the individual to whom the request was made;

- (3) the disposition of the request;
- (4) the date of such disposition; and
- (5) any additional details to provide a complete statement of the circumstances.

ANSWER TO INTERROGATORY NO. 1g

No.

INTERROGATORY NO. 1h

Whether she claims that she was required to wait longer to be eligible for a promotion than similarly qualified men? If so, provide the following information separately for each and every such claim:

- (1) the date which she allegedly should have been eligible;
- (2) a comparison of her qualifications with those of any men alleged to have been favored as to promotion eligibility;
- (3) names and positions of personnel involved; and
- (4) additional facts to provide a complete statement of each claim.

ANSWER TO INTERROGATORY NO. 1h

This interrogatory is applicable only to Wanda Hylton, as neither Doris Scales nor Stephanie Ressel was hired by the Sheriff.

The United States does not claim that Wanda Hylton was required to wait longer to be eligible for promotion than similarly qualified men, but rather that she was never even considered for hire or assignment to deputy sheriff in the PCSD.

INTERROGATORY NO. 1i

Whether she claims that she was discriminated against on the basis of sex by not being selected for a position on the basis of criteria which allegedly were not necessary for job performance and/or are not applied uniformly to men and women? If so, provide the following information separately for each and every such claim:

- (1) describe the criteria;
- (2) the date such selection criteria was applied;
- (3) the position and the personnel involved;
- (4) the date she was notified that she was not so selected; and
- (5) additional facts to provide a complete statement of each claim.

ANSWER TO INTERROGATORY NO. 11

The United States contends that the Sheriff unlawfully refused to hire Wanda Hylton, Stephanie Ressel and Doris Scales as deputy sheriffs on the basis of their sex; that the Sheriff unlawfully refused to assign Ms. Hylton to deputy sheriff on the basis of her sex; and that the Sheriff unlawfully refused to hire Ms. Scales as a dispatcher on the basis of her sex, and in retaliation for her efforts to be considered for appointment as a deputy.

In further response to this Interrogatory, with respect to:

DORIS SCALES

The Sheriff has admitted (Williams Dep. 8/11/83, p. 225) that he has had and continues to have a policy of not employing women deputy sheriffs in the classification of corrections officer. The Sheriff further has conceded (Id., p. 245) that when Ms. Scales applied for employment with the PCSD in 1980, she was interested in both a deputy sheriff job as well as a dispatcher job.

During the course of the Equal Employment Opportunity Commission's ("EEOC") investigation, the Sheriff advised the EEOC

that he rejected Ms. Scales for employment on the ground that his "background investigation [of her] revealed things that led [him] to believe that Mrs. Scales would not be dependable or reliable" (Govt. Ex. 6 attached to Williams Dep. 8/11/83). In his August 11, 1983 deposition taken by the United States, Sheriff Williams testified that there were two things revealed in his background investigation of Ms. Scales which led him to believe that she would not be dependable or reliable, and upon which he decided not to hire her: namely, that in 1979 there had been issued a civil judgment against her in the amount of \$285 for rent arrears after she apparently had subleased her apartment, and that he had been told by Clifford Boyd, one of his shift supervisors, that Ms. Scales "had a history of not paying her bills" (Williams Dep. 8/11/83, pp. 247, 257-258, 268, and Govt. Ex. 25 attached thereto). Indeed, the Sheriff testified that the civil judgment against Ms. Scales was alone a sufficient basis for not hiring her (Id., at p. 261).

Although there had been a civil judgment issued against Ms. Scales on September 27, 1979, that judgment was fully satisfied by Ms. Scales on October 12, 1979 (Govt. Ex. 25 attached to Williams Dep. 8/11/83). The Sheriff testified that he never asked Ms. Scales to explain the facts and circumstances surrounding the 1979 civil judgment against her (Williams Dep. 8/11/83, p. 260), that he never contacted any of the work or personal references provided to him by Ms. Scales when she applied (Id., p. 259), and that the only person he spoke to about Ms. Scales before he decided not to hire her was Mr. Boyd (Id., p. 259).

The treatment accorded Doris Scales by Sheriff Williams is in stark contrast to that accorded David L. Morse, an incumbent male deputy sheriff in the PCSD hired as a deputy by Sheriff Williams on July 1, 1980, less than two weeks after Ms. Scales was notified by the Sheriff that she had been rejected for employment. Not only does the record reflect that in 1979 a civil judgment had been entered against Mr. Morse in the amount of \$2,481 (or almost nine times the amount of the judgment against Ms. Scales), but the Sheriff has testified that he learned about the judgment against Mr. Morse during his background investigation of Mr. Morse and before he hired him (Id., pp. 262-263). Indeed, while the Sheriff admitted that he never inquired about the facts and circumstances surrounding the judgment against Ms. Scales, the Sheriff has testified (Id., pp. 262-265) that when he learned about the judgment against Mr. Morse, he talked to the loan officer of the bank which held the note upon which Mr. Morse defaulted, and learned from the loan officer that the judgment against Mr. Morse had been entered as a result of Mr. Morse's default on a loan which he had obtained from the bank for the purchase of a car, and that the bank subsequently repossessed the car.

The Sheriff's appointment of David Morse as a deputy is not the only example of the disparate and, thus, we contend unlawful treatment accorded Doris Scales by the Sheriff. The record reflects that - prior to Ms. Scales' application, during the pendency of her application, and after her rejection for employment - the Sheriff did not adhere to his own procedures and standards in

hiring men for deputy positions, and the Sheriff hired numerous men as deputy sheriffs who did not meet the Sheriff's own stated minimum qualification standards.

For example, on July 1, 1980 - the same day on which Mr. Morse was hired and less than two (2) weeks after Ms. 'Scales' rejection - the Sheriff hired Bradford Roane, male, as a deputy sheriff. In his October 13, 1983 deposition taken by the United States, the Sheriff testified (at pp. 295-296) that he would not hire a person who had a history of disregard for the law, that a person who had a series of motor vehicle moving violations demonstrated a disregard for the law, and that he would not hire a person who had four or more moving violations. The record, however, reflects that the Sheriff did not apply this standard to Mr. Roane, since Mr. Roane had four (4) moving violation convictions - excessive speed (65/55), excessive speed (60/40), excessive speed (62/55), and following close - at the time of his hire as a road deputy, and this information had been set forth on Mr. Roane's application for employment (Govt. Ex. 73 attached to Williams Dep. 10/12/83).

On July 1, 1980, the same day that Messrs. Morse and Roane were hired, the Sheriff also hired Danny Stacy, male, as a deputy sheriff. The Sheriff's standards reflect that all applicants must pass a background investigation with respect to, among other things, their past work performance and whether they have "proven dependability and reliability" (Govt. Ex. 6 attached to Williams Dep. 8/11/83); and the Sheriff has testified that in evaluating

these two factors, he regularly contacts prior employers and community members (Williams Dep. 10/12/83, pp. 298-301). The only law enforcement experience Mr. Stacy had prior to his hire by the Sheriff was as a trooper for the Virginia State Police for five (5) months, from November 1975 to April 1976, and Mr. Stacy indicated on his application for employment with the PCSD that he had left the State Police for "personal" reasons (Govt. Ex. 44 attached to Williams Dep. 10/12/83). Contrary to his "regular" policy of checking an applicant's past work performance with prior employers, the Sheriff has testified (Williams Dep. 8/11/83, p. 220) that he never contacted the State Police with respect to Mr. Stacy's work record. Indeed, Mr. Stacy has testified (Stacy Dep. 11/10/83, pp. 101-102) that prior to his hire he did not discuss his background or prior employment with the Sheriff. Had the Sheriff checked Ms. Stacy's work record with the Virginia State Police, he would have learned that: the Virginia State Police conditionally appointed Mr. Stacy as a trooper on November 16, 1975, and accepted Mr. Stacy's resignation on April 16, 1976, before Mr. Stacy had completed his probationary period and his basic training; Mr. Stacy's letter of resignation followed a directive from his commanding officer to submit a letter explaining his absence from the training school, which Mr. Stacy never wrote; Mr. Stacy stated in his letter of resignation that he was resigning "[d]ue to the many rules and regulations which the Department sets for a trooper I feel I could not live and adjust my way of life to comply with them;" and Mr. Stacy is

not recommended for any position with the State Police (See Exhibit A attached hereto).

Between the time that Doris Scales submitted her application and the time that she was notified of her rejection by the Sheriff, the Sheriff hired two more men as deputy sheriffs: William O. Ring, on May 1, 1980; and Hassel Nicholson on June 1, 1980 (Govt. Exs. 40 and 72 attached to Williams Dep. 10/12/83).

The Sheriff has testified that he has required applicants for hire to be physically fit and that he would not hire a person who listed on his application a physical ailment which would prohibit him from performing the duties assigned to him (Williams Dep. 10/12/83, pp. 308-309). Nevertheless, the Sheriff hired Mr. Ring and did not have Mr. Ring take a physical examination prior to hire, despite the fact that Mr. Ring stated on his application that he was physically "limited in lifting" (Govt. Ex. 72 attached to Williams Dep. 8/11/83). The record reflects that Mr. Ring resigned on March 13, 1981 - less than one year after he was hired -because he could not carry food trays, weighing approximately thirty (30) pounds, to the PCSD from the restaurant across the street because of a back injury; and the PCSD's records reflect that Mr. Ring resigned for medical reasons. (Id.).

As previously stated, the Sheriff hired Hassell Nicholson as a deputy sheriff on June 1, 1980. Notwithstanding the Sheriff's stated requirement that all applicants must take and pass a

written examination in order to be considered for hire (Govt. Ex. 6 attached to Williams Dep. 8/11/83), the Sheriff has conceded that he did not administer a written examination to Mr. Nicholson (Id., p. 165). Further, notwithstanding his stated policy of contacting applicants' prior employers, and despite his knowledge that Mr. Nicholson had been employed for two years (1972-1974) by the PCSD under the prior Sheriff, the Sheriff testified that he never contacted the former Sheriff to find out about Mr. Nicholson's work record and the circumstances surrounding his termination from employment (Id., p. 180). Indeed, the Sheriff testified that the only persons he talked to about Mr. Nicholson's prior employment with the PCSD were Mr. Nicholson himself and Mr. Boyd, who also previously had been employed by the PCSD, and that both of them told the Sheriff that Mr. Nicholson's prior termination was by resignation rather than by dismissal (Williams Dep. 8/11/83, pp. 187-189, 196). The Sheriff further conceded, however, that he did not know the particular facts and circumstances surrounding Mr. Nicholson's prior termination and, further, that he never inquired about them (Id., p. 188). The Sheriff testified that all he had been told by Mr. Nicholson was that Mr. Nicholson had resigned because he felt that he was being harassed by the former Sheriff regarding an incident in which he was seen sitting in his car talking to a woman who was sitting in her car (Id., p. 188). The record, however, reflects that the former Sheriff asked for Mr. Nicholson's resignation after Mr. Nicholson was observed while on duty, by the former Sheriff and

Andrew D. Jones, then a trooper and now a special agent with the Virginia State Police, with a woman in her car which was parked some distance off a rural road in the County (Jones Dep. 11/10/83, pp. 84-85, 88-90).

Notwithstanding the Sheriff's stated requirements (Govt. Ex. 6 attached to Williams Dep. 8/11/83) that all applicants must submit an application, take and pass a written examination and pass a background investigation in order to be considered for hire, the record reflects that on January 1, 1980, the Sheriff hired Clifford Boyd as a deputy sheriff, without having had Mr. Boyd submit an application, without having administered a written examination to Mr. Boyd and without having conducted any background investigation of Mr. Boyd (Williams Dep. 8/11/83, pp. 165, 172). Indeed, the Sheriff has testified (Id., p. 198) that the only thing he did prior to hiring Mr. Boyd was to talk with him concerning his dismissal from the PCSD by the prior Sheriff. So also, while the Sheriff has testified that "[a]nything that is of a criminal nature other than traffic violations" would disqualify an applicant for employment (Williams Dep. 10/12/83, p. 294) and, indeed, that if an applicant had a criminal conviction, the Sheriff would not continue to process him for employment (Id., p. 302), the Sheriff conceded that before he hired Mr. Boyd, he knew that Mr. Boyd had a prior conviction for the possession of illegal alcohol (Williams Dep. 8/11/83, p. 205; see also Boyd Dep. 10/12/83, p. 12).

On the same day that the Sheriff hired Mr. Boyd, January 1, 1980, the Sheriff also hired _____ */ and _____, both males, as deputy sheriffs, assigning the former to road deputy and the latter to corrections officer (Govt. Exs. 61 and 63 attached to Williams Dep. 10/12/83). Until their hire by Sheriff Williams, Messrs. _____ * and _____ * had been employed in the PCSD under Sheriff William's predecessor since 1976. Although the Sheriff's stated standards for hire require that an applicant have a good past work record and have proven dependability and reliability (Govt. Ex. 6 attached to Williams Dep. 8/11/83), and notwithstanding the Sheriff's own Rules and Regulations prohibiting immoral or indecent conduct (Govt. Ex. 8 attached to Williams Dep. 8/11/83), the Sheriff has admitted that he hired Messrs. _____ * and _____ * with the knowledge that both of them had been "sleeping with a female that was not neither one of them's wife" while they were employed by the PCSD under the prior Sheriff (Williams Dep. 8/11/83, pp. 146-147, 158-160) The record also reflects that the woman with whom Messrs. _____ * and _____ * were involved was _____ *, and that she had been employed as a clerk in the PCSD under Sheriff Williams' predecessor but was not hired by Sheriff Williams when he took office on January 1, 1980. The Sheriff has testified that he decided to hire Messrs. _____ * and _____ * but not Ms. _____ *, because he "was hoping that [he] could correct the

*/ The United States with the advice and consent of the Court, has deleted these names designated by an asterisk for confidentiality reasons.

problem" (Williams Dep. 8/11/80, p. 159) and that their jobs (road deputy and correctional officer) were "more vital than a clerk" (Id., p. 160).

Lastly, the Sheriff has testified that he requires applicants to take and pass a written examination as a means of trying to "get the best possible qualified candidates" (Williams Dep. 8/11/83, p. 167) and that the exam score achieved demonstrates relative ability to perform (Id., p. 169). As previously noted, Doris Scales achieved a score of 90 on the written examination. The record reflects that, during 1981, the Sheriff hired twenty-one (21) persons, all of whom were men, as deputy sheriffs, twelve (12) of whom were administered no written examination, and nine (9) of whom were administered the same written examination that was administered to Ms. Scales and on which she obtained a score of 90. The score achieved by each of these nine deputies is as follows:

<u>Name</u>	<u>Date of Hire</u>	<u>Exam Score</u>
Roger Gray	January 7, 1980	75
Lester Purdue	January 7, 1980	75
William O. Ring	May 1, 1980	76
Elmer L. Sehen	June 16, 1980	97
Bradford P. Roane	July 1, 1980	89
David L. Morse	July 1, 1980	71
Danny Stacy	July 1, 1980	84
Owen Issacs	September 17, 1980	87
John Sehen	October 1, 1980	90

Ms. Scales' score of 90 on the written examination was also higher than the scores achieved by three of the four persons hired during 1980 as dispatchers:

<u>Name</u>	<u>Date of Hire</u>	<u>Exam Score</u>
Timmy Rogers	July 1, 1980	72
Lynn Berquist	July 1, 1980	93
Douglas Joyce	July 1, 1980	75
Katherine Sheppard	July 1, 1980	75

INTERROGATORY NO. 1j

Whether she claims that she was discriminated against on the basis of sex by receiving less favorable assignments of work than men holding the same position? If so, provide the following information separately for each and every such claim:

(1) the date on which each and every claim first arose and its duration;

(2) the specific assignments;

(3) the names and job titles of the persons involved; and

(4) additional facts to provide a complete statement of each claim.

ANSWER TO INTERROGATORY NO. 1j

No.

INTERROGATORY NO. 1k

Whether she claims that she has been discouraged from applying for positions which were previously held by men or which involved a supervisory authority over men? If so, provide the following information separately for each and every such claim:

(1) the date each and every claim first arose and its duration;

(2) the description of the acts of Defendant that discouraged her;

(3) the names and positions of persons involved; and

(4) additional facts to provide a complete statement of each claim.

ANSWER TO INTERROGATORY NO. 1k

Yes. Please refer to our Answers to Interrogatory Nos. 1a, 1c, and 1e, supra.

INTERROGATORY NO. 11

Whether she claims that she was denied training opportunities because of discrimination based on sex? If so, provide the following information separately for each and every such claim:

- (1) the date each claim first arose and its duration;
- (2) the nature of the training opportunities involved;
- (3) a complete description of any request she made for such opportunities;
- (4) the names and positions of persons involved; and
- (5) additional facts to provide a complete statement of each claim.

ANSWER TO INTERROGATORY NO. 11

Yes. Please refer to our Answers to Interrogatory Nos. 1a, 1c, and 1e, supra.

INTERROGATORY NO. 1m

State fully any and all additional claims not set forth above which she asserts in this action and specify:

- (1) the nature and basis of such claims;
- (2) the dates on which each such claim occurred;
- (3) the duration of each such claim;
- (4) the names and positions of persons involved; and
- (5) additional facts to provide a complete statement of each claim.

ANSWER TO INTERROGATORY NO. 1m

There are no additional claims of discrimination at this time. However, the United States is still conducting discovery and will supplement these Answers to Defendant's First Interrogatories should additional claims be revealed.

INTERROGATORY NO. 1n

Describe in detail all documents that support the claims covered in the responses to subparagraphs (a) through (m) above.

ANSWER TO INTERROGATORY NO. 1n

The documents in support of the above claims consist of the following:

Deposition of Jesse Williams taken August 11, 1983, and all exhibits attached thereto;

Deposition of Jesse Williams taken October 12, 1983, and all exhibits attached thereto;

Deposition of Wanda Hylton taken December 2, 1983, and all exhibits attached thereto;

Deposition of Roger Gray taken November 10, 1983;

Deposition of Raymond Hassell Nicholson taken November 10, 1983;

Deposition of Clifford Boyd taken October 12, 1983;

Deposition of Danny Stacy taken November 10, 1983, and all exhibits attached thereto;

Deposition of Andrew D. Jones taken November 10, 1983, and all exhibits attached thereto; and

Attachment A to the United States' Answers to Defendant's First Interrogatories.

INTERROGATORY NO. 2

State whether any women who was a victim of discrimination as alleged by the Plaintiff, filed a complaint with the Equal Employment Opportunity Commission and the date on which such complaint was filed.

ANSWER TO INTERROGATORY NO. 2

Yes. Doris Scales filed a charge of sex discrimination with the Equal Employment Opportunity Commission on July 30, 1980.

INTERROGATORY NO. 3

Please produce all documents relating to the filing, prosecution and disposition of this complaint in the Equal Employment Opportunity Commission.

ANSWER TO INTERROGATORY NO. 3

Although styled as an interrogatory, this number is properly a Rule 34, F.R. Civ.P., request to produce documents. In answer, the United States states that it will make available, at a mutually convenient time and place, those documents contained in the Equal Employment Opportunity Commission file on the sex discrimination charge filed by Doris Scales, to the extent that such disclosure is not prohibited by statute or by rule or regulation pursuant thereto.

INTERROGATORY NO. 4

What statistics do you contend tend to show that the Defendant maintains or has maintained the practices, policies, customs and usages which discriminate or discriminated with respect to hiring, promotion and conditions of employment on the basis of sex with respect to the employment of females as sworn officers in the Patrick County Sheriff's Department.

ANSWER TO INTERROGATORY NO. 4

Please refer to our Answer to Interrogatory No. 1, supra, which sets forth evidence of overt, intentional discrimination by the Sheriff against women on the basis of their sex, as well as the statistics upon which the United States intends to rely. In addition, the United States contends that the Sheriff of Patrick County has never employed a woman in a deputy capacity, whether as a road deputy, a corrections officer or as a courtroom secur-

ity officer. Further, the United States contends that the promotion of Kathy Sheppard from dispatcher to process server was not equivalent to the appointment of a woman as a deputy because process server is not one of the job titles within the deputy classification recognized by the State Compensation Board for salary purposes (Charles K. Tribble Deposition taken October 26, 1983, pp. 24, 30). Nor does the position of process server entail any of the training required of deputies in Virginia (Carl M. Cimino Deposition taken November 29, 1983, p. 25).

INTERROGATORY NO. 5

Please set forth the name, address and present occupation of all those persons whom the Plaintiff intends to call as witness, either in person or through deposition, in the prosecution of its case, either in chief or in rebuttal.

ANSWER TO INTERROGATORY NO. 5

At this time, the United States intends to call the following individuals as witnesses, either in person or through deposition, for its case-in-chief:

Jesse W. Williams
Sheriff of Patrick County
Patrick County Sheriff's Department
Stuart, Virginia 24171

Doris Scales
Self employed as a sewer
RFD 2, Box 17
Stuart, Virginia 24171

Stephanie Gregory Ressel
Assistant Manager, Dee's Hallmark Shop
200 College Street
Martinsville, Virginia 24112

Wanda Hylton
Director, Patrick County Multi-Disciplinary
Team on Child Abuse and Neglect
219 Pine Street, Apt. 4
Stuart, Virginia 24171

Annie Wise Hylton
Rte. 2, Box 241
Meadows of Dan, Virginia 24120

Carl N. Cimino
Deputy Director, Virginia Department of
Criminal Justice Services
8th Street Office Building
805 Broad Street
Richmond, Virginia 23219

Charles K. Tribble
Member, Virginia Compensation Board
9th Street Office Building
9th & Grace Streets
Richmond, Virginia 23219

Danny Stacy,
Deputy, Patrick County Sheriff's Department
P.O. Box 1101
Buena Vista Avenue
Stuart, Virginia 24171

R.H. Wimmer
Captain
Virginia State Police
P.O. Box 27472
Richmond, Virginia 23261-7472

Clifford Boyd
Deputy, Patrick County Sheriff's Department
RFD 2
Stuart, Virginia 24171

Raymond Hassell Nicholson
Depty, Patrick County Sheriff's Department
Route 1, Box 29
Critz, Virginia

Andrew D. Jones
Special Agent, Virginia State Police
P.O. Box 388
Stuart, Virginia 24171

Edward M. Turner, Jr.
County Administrator, Patrick
County, Virginia
P.O. Box 466
Stuart, Virginia 24171

Lawrence Burton
Commonwealth's Attorney
Stuart, Virginia 24171

The United States objects to that part of this Interrogatory requesting the names of persons the United States intends to call as rebuttal witnesses. Further, the United States does not know at this time who it intends to call as rebuttal witnesses.

INTERROGATORY NO. 6

Please set forth the names, addresses and present occupations of all persons known to the Plaintiff who have any knowledge concerning the allegations set forth in paragraphs 7 and 10 of the Plaintiff's Complaint.

ANSWER TO INTERROGATORY NO. 6

Jesse W. Williams
Sheriff of Patrick County
Patrick County Sheriff's Department
Stuart, Virginia 24171

Wanda Hylton
Director, Patrick County Multi- Disciplinary
Team on Child Abuse and Neglect
219 Pine Street, Apt. 4
Stuart, Virginia 24171

Doris Scales
Self-employed as a sewer
RFD 2, Box 17
Stuart, Virginia 24171

Stephanie Gregory Ressel
Assistant Manager, Dee's Hallmark Shop
200 College Street
Martinsville, Virginia 24112

William Bradford Reynolds
Assistant Attorney General
Civil Rights Division
U.S. Department of Justice
Washington, D.C. 20530

David L. Rose, Chief
Employment Litigation Section
Civil Rights Division
U.S. Department of Justice
Washington, D.C. 20530

William B. Fenton
Deputy Chief
Employment Litigation Section
Civil Rights Division
U.S. Department of Justice
Washington, D.C. 20530

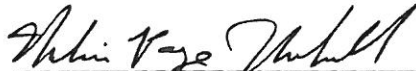
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Anthony P. Giorno
Attorney
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P.O. Box 1076
Stuart, Virginia 24171

Respectfully submitted,

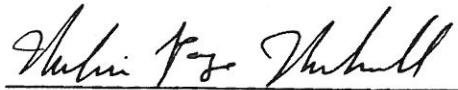


JOHN M. GADZICHOWSKI
Senior Trial Attorney
MELISSA P. MARSHALL
Trial Attorney
Civil Rights Division
U.S. Department of Justice
Washington, D.C. 20530

CERTIFICATE OF SERVICE

I, Melissa Page Marshall, hereby certify that on December 19, 1983, I served a copy of the foregoing United States Answers To Interrogatories, as well as the Attachments thereto, by Federal Express, upon the following:

ANTHONY P. GIORNO, ESQUIRE
Blue Ridge Street
P.O. Box 1076
Stuart, Virginia 24171



MELISSA PAGE MARSHALL
Trial Attorney
U.S. Department of Justice
Civil Rights Division
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(202) 633-3895

Counsel for Plaintiff United
States of America