

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

BUILDING AND CONSTRUCTION TRADES
COUNCIL OF ST. LOUIS, MISSOURI,
AFL-CIO; ST. LOUIS JOURNEYMEN
PLUMBERS' LOCAL UNION NO. 35 OF
THE UNITED ASSOCIATION OF JOURNEY-
MEN AND APPRENTICES OF THE PLUMBING
AND PIPEFITTING INDUSTRY OF THE
UNITED STATES AND CANADA, AFL-CIO;
THE PIPEFITTERS LOCAL UNION NO. 562,
UNITED ASSOCIATION OF JOURNEYMEN
AND APPRENTICES OF THE PLUMBING AND
PIPEFITTING INDUSTRY OF THE UNITED
STATES AND CANADA, AFL-CIO; THE
SHEET METAL WORKERS' INTERNATIONAL
ASSOCIATION, LOCAL UNION NO. 36,
AFL-CIO; and THE LOCAL UNION NO. 1
OF THE INTERNATIONAL BROTHERHOOD
OF ELECTRICAL WORKERS, AFL-CIO,

Defendants.

CIVIL ACTION
NO. 66 C 58(2)

PLAINTIFF'S PRE-TRIAL SUBMISSION

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INTRODUCTION

Pursuant to Pre-Trial Orders No. 1 and No. 2 entered in this case, the plaintiff respectfully submits its statement of ultimate facts to be proved, its statement of the legal authorities to be relied upon, its lists of prospective witnesses and its lists of probable documents to be offered into evidence. This submission is complete except for such ultimate facts, additional witnesses or documents as may be revealed as a result of the responses to interrogatories served on the defendants by the plaintiff on December 19, 1966, the inspection of certain additional records of Pipefitters Local 562 scheduled by agreement for January 4, 1967, additional depositions pertaining to Pipefitters Local 562 scheduled by agreement for January 9, 1967, and depositions pertaining to Building and Construction Trades Council commenced December 30, 1966, and to be continued by agreement on January 5, 1967.