

100 : 31081

BARBARA CANTWELL CHRISTMAN, et al.,)
Plaintiffs,)
v.)
AMERICAN CYANAMID COMPANY,)
Defendant.)

THOMAS F. STAFFORD, CLERK

Civil Action
No. 80-0024-P

DEFENDANT AMERICAN CYANAMID COMPANY'S FIRST
SUPPLEMENTAL RESPONSES TO PLAINTIFFS'
FIRST INTERROGATORIES

Pursuant to Federal Rule of Civil Procedure 33, defendant provides the following supplemental responses to Plaintiffs' First Interrogatories without, however, waiving its position that such information is irrelevant to matters properly in litigation in this case. Defendant also reasserts objections 1, 3, 4, 5, 6 and 7 of its First and Second Objections to Plaintiffs' First Interrogatories to the extent they apply to the material now being provided for the first time. A copy of these objections is attached hereto.

2. With regard to defendant's Willow Island facility:

(d) For each year since 1965, state separately the number of male employees and the number of female employees employed in each department identified in response to Interrogatory No. 2(a).

Answer: See Objection 1. From 1975 to the present, the answer is as follows:

<u>Year</u>	<u>Department</u>	<u>Employees</u>	
		<u>Male</u>	<u>Female</u>
1975	Special Chemicals	101	13
1975	Pigments	54	8
1975	Aureomycin	23	0
1975	Catan	24	0
1975	Catalyst	8	0
1975	Beta Naphthol Complex	37	0
1975	Stores	27	0
1975	Maintenance	225	0
1975	Power/Effluent	28	0
1976	Special Chemicals	68	6
1976	Pigments	66	9
1976	Aureomycin	24	0
1976	Catan	25	0
1976	Catalyst	23	5
1976	Beta Naphthol Complex	44	0
1976	Stores	29	0
1976	Maintenance	240	1
1976	Power/Effluent	27	0
1977	Special Chemicals	89	7
1977	Pigments	61	8
1977	Aureomycin	23	0
1977	Catan	25	0
1977	Catalyst	15	6
1977	Beta Naphthol Complex	45	0
1977	Surfactants	9	0
1977	Stores	30	0
1977	Maintenance	204	0
1977	Power/Effluent	22	0

<u>Year</u>	<u>Department</u>	<u>Employees</u>	
		<u>Male</u>	<u>Female</u>
1978	Special Chemicals	90	7
1978	Pigments	57	8
1978	Aureomycin	24	0
1978	Catan	25	0
1978	Catalyst	23	6
1978	Beta Naphthol Complex	45	0
1978	Surfactants	9	0
1978	Stores	30	0
1978	Maintenance	205	0
1978	Power/Effluent	23	0
1979	Special Chemicals	78	3
1979	Pigments	38	6
1979	Aureomycin	29	0
1979	Catan	21	0
1979	Catalyst	12	4
1979	Beta Naphthol Complex	47	0
1979	Surfactants	8	0
1979	Stores	32	1
1979	Maintenance	228	2
1979	Power/Effluent	21	0
1980	Special Chemicals	88	6
1980	Pigments	24	4
1980	Aureomycin	27	1
1980	Catan	20	0
1980	Catalyst	15	5
1980	Beta Naphthol Complex	6	0
1980	Surfactants	8	0
1980	Stores	30	0
1980	Maintenance	196	0
1980	Power/Effluent	21	0

(b) If so, describe each method of advertisement or recruitment and its purpose; (c) Identify the individual(s) responsible for adopting and implementing the program; and (d) Identify any publication used.

Answer: For the years 1970-1974 see Objection 1. Since 1975, the answer is as follows:

In May 1978, the Willow Island Plant recruited industrial mechanics by using classified display advertising in the following newspapers; Marietta Times, Marietta, Ohio; Parkersburg News, Parkersburg, W. Va.; Parkersburg Sentinel, Parkersburg, W. Va.; St. Marys Oracle, St. Marys, W. Va.; and the Tyler Star News, Sistersville, W. Va. The Willow Island Plant Manager, R. J. Clay, was responsible for adopting and implementing the program.

24. Identify any documents reflecting or relating in any way to the absence of women in P&M positions and to a decision to hire women into those positions at any time since 1965.

Answer: See Objection 1. This interrogatory also seeks documents concerning defendant's affirmative action plans, policies and programs, and documents filed with federal agencies regarding defendant's compliance with employment regulations. Such inquiries concern a process of searching self-examination by the company and sensitive negotiation between the government and the company. As a matter of public policy, materials reflecting this policy of candid self-evaluation and self-criticism should rarely be discoverable. Intrusion into this process could frustrate and make less useful the self-examination and conciliation that is often necessary and is sought by government agencies. Absent a showing of special relevance--which is not apparent here--these matters should not be inquired into.