

To the Sheriff of Fairfield County, either of his Deputies except John W. Sculley, or either Constable of the Towns of Norwalk, Bethel or Danbury, in said County—GREETING:

By authority of the State of Connecticut, you are hereby commanded to attach to the value of one hundred thousand (\$100,000) dollars, the goods or estate of Martin Lawlor, John Cords, George W. Morehouse, George H. Gilbert, William P. Bailey, Howard S. Gilbert, Charles Green, Charles Lathrop, and John McDole, all of said town of Bethel; Charles J. Barrett, Martin Gorman, Peter Gallagher, Daniel P. Kelley, Simon Blake, Hugh C. Shalvoy, Michael C. Griffin, Patrick Connolly, Albert Hoyt, and John Morris, all of said Danbury; Robert Pearson, John E. Paul, Charles Flynn, John W. Sculley, Stephen Carlin, Charles Moore, James Whitney, William A. Brennan, and Homer Rockwell, all of said town of Norwalk; James P. Maher, of the City and State of New York; William C. Hennelly and Charles Morris, both of the City of Boston in the State of Massachusetts; William Clayton and George H. Phillips, of Brooklyn in the State of New York; John A. Moffitt, John Horrigan, and Michael Brennan, of the town of Orange in the State of New Jersey; James Byrne and Mark L. White, of the City of Newark in the State of New Jersey; Frank Keegan and Patrick Lynch, of Philadelphia in the State of Pennsylvania; John Phillips, of Brooklyn in the State of New York; Samuel Gompers, James O'Connell, and Frank Morrison, of Washington, District of Columbia; James Duncan, of Boston, State of Massachusetts; John Mitchell, of Indianapolis, Indiana; Max Morris, of Denver, Colorado; Thomas I. Kidd, of Chicago, Illinois; Dennis A. Hayes, of Philadelphia, Pennsylvania; and John B. Lennon, of Bloomington, Illinois; Frederick Taylor, Owen Reiley, Charles Smith, Edward Cunningham, George A. Davis, George Gerrish, Peter Ward, Fanton W. Beers, Albert Berg, Addison Hathaway, John McNamara, John Redway, Ernest Talmadge, W. J. Weisheit, Daniel Riordan, John E. Rooney, Thomas Saunders, Max Singerwode, John Spendlove, Peter F. Kearney, Patrick Keating, James Kinnane, Thomas Layhe, S. Wallace Osborn, all of said town of Norwalk, Connecticut; Barney Murphy, Owen Murray, John Halpin, John Kane, Edward Manion, Edward Culhane, Edward Johnson, Patrick Troy, Patrick Wixted, Henry Gilbert, Starr Bassett, William Ohler, William Ochs, Myron Trowbridge, Frederick Benedict, Orrin Smith, Charles Frost, ~~George Osborne~~, Reuben Johnson, Virgil Dibble, Charles Bailey, William Stone, E. Romaine Barnum, Byron Morgan, Joseph Burr, Levi Short, ~~Nathan Gilbert~~, Henry C. Judd, T. Archibald Evans, all of said town of Bethel; Theophilus Abieniste, Andrew Aitkin, Nicholas W. Allen, Thomas H. Allen, Daniel H. Barnes, Nicholas W. Barzin, Jerome W. Bates, Charles Beckett, John Beckett, Jr., Clemens Beschele, Frederick S. Blackburn, John Blake, Herman H. Bohman, Nelson H. Booth, James N. Boughey, Thomas Boyd, John Bradshaw, Peter J. Brennan, Alphonse Bresson, Theodore Bright, Orrin L. Bronson, Byron S. Brooks, Thomas D. Brooks, Andrew G. Brown, William F. Burns, Chauncey H. Butler, Stephen F. Butler, William H. Butler, John Byrone, James P. Callahan, John J. Callahan, Achille Canale, Thomas J. Cassidy, William Clancy, Elmer R. Clark, John H. Collins, Lewy W. Comes, Michael W. Corbett, James D. Costello, John H. Craft, Byron W. Crane, James Crotty, John Crotty, Michael Crowe, Patrick Culligan, Peter T. Currie, William Deakin, George F. Denton, George Dickens, James Dillon, Thomas J. Durkin, James Durnin, William S. Dutcher, John Dyer, John Ellegett, Patrick Ellegett, Patrick Elliott, John G. Ely, Carl Erdman, Timothy H. Farrell, Patrick J. Feeley, Patrick Fennell, Patrick J. Fisher, Patrick Fitzgerald, Patrick Flannagan, Emil Floyeske, Thomas Foley, Christian Garni, William E. Geartner, John Gilbride, Patrick Gildea, George J. Goebel, Wright Hampson, David J. Hardy, Alexander Harkness, John Harkness, Patrick Hart, John Hassett, Stephen Havran, Michael Hennessy, George M. Herrick, Ernest H. Heuser, Charles A. Hodge, Adolph Holdeichel, Nathan C. Hoy, William Humphries, Patrick F. Hunt, Charles W. Hurd, Michael Hurd, Patrick E. Jeffrey, Daniel Kearns, Martin Keating, Thomas Keenan, Michael F. Kenney, John Keough, Charles J. King, Frank Kornhass, Frank E. Krebs, Martin Lauf, John M. Lawler, Edward D. Lees, Thomas Leonard, William E. Luke, Michael F. Lynch, George F. Marshall, Jeremiah McCarthy, Patrick J. McCarthy, Patrick T. McCarthy, Martin McCue, Thomas E. McGauley, Martin McGettrick, James F. McGlone, John McGlone, Peter McGlone, Patrick McGrath, Charles F. McHan, Thomas McHugh, Daniel McNerey, Frank Meath, Henry Messer, Henry C. Michael, George J. Miller, John Miller, Jr., Patrick Moffitt, ~~Michael Moran~~, Gustave Mougin, Eugene L. Mulkin, Daniel Murphy, Timothy Murray, John B. Nowlan, William V. Nowlan, George T. Oakley, John O'Boy, Peter O'Boy, Louis E. Orton, Daniel J. Osborne, Alvah S. Pearce, George H. Phillips, Peter Picken, Arthur I. Pickett, John Pribula, Jacob Prinz, Christian Rheinhold, Frank Rhode, John Rooney, Frank E. Seaman, Louis Shack, Charles Shaffer,

Frederick L. Stahl, Nicholas Streibig, George Stuckey, Stephen Stuckey, Michael E. Sullivan, Mark Sullivan, William S. Sullivan, Joseph Tosi, Thomas E. Waters, Frank K. Wildman, Samuel S. Wilson, Michael Connors, John J. Culhane, John Leonard, all of said town of Danbury; and for want thereof, their bodies, and them have to appear before the Superior Court for Fairfield County, on the first Tuesday of October, 1903, then and there to answer unto Dietrich E. Loewe and Martin Fuchs, both of said town of Danbury, in a civil action wherein the plaintiffs complain and say:

First Count.

1. Said Samuel Gompers is President, said Frank Morrison is Secretary, said John B. Lennon is Treasurer, said John Duncan, John Mitchell, James O'Connell, Max Morris, Thomas I. Kidd, and Dennis A. Hayes are Vice Presidents of the combination of persons hereinafter described, known as the American Federation of Labor, and were and are, agents of the other defendants in doing the acts hereinafter described. Said James A. Moffitt is President, said Martin Lawlor is Vice President, said John Phillips is Secretary, said James P. Maher is the Treasurer, said Charles J. Barrett, Robert Pearson, Peter Gallagher, James Byrne, Mark L. White, George J. Phillips, William Clayton, Michael Brennan, Frank Keegan and Charles Morris, are the Directors of the Combination hereinafter described and known as the United Hatters of North America, and were and are the agents of the other defendants in doing the acts hereinafter described. Said George W. Morehouse is President, said George H. Gilbert is Vice President, said William P. Bailey is Secretary, and said Howard S. Gilbert is Treasurer of the combination known as Local 2, United Hatters of North America, hereinafter mentioned, and were and are agents of the other defendants in doing the acts hereinafter described, and many of the other defendants are members of said Local No. 2. Said Charles Green is President, Charles Lathrop is Secretary, and John McDole is Treasurer of the combination hereinafter described, known as Local No. 1, United Hatters of North America, and were and are agents of the other defendants in doing the acts hereinafter described, and many of the other defendants are members of said Local No. 1. Said Charles J. Barrett is President, said Simon Blake is Vice President and said Hugh C. Shalvoy is Secretary and Treasurer of the combination known as Local No. 11, United Hatters of North America, hereinafter mentioned, and were and are the agents of the other defendants in doing the acts hereinafter described, and many of the other defendants are members of said Local No. 11. Said Michael C. Griffin is Vice President, said Patrick H. Connolly is Secretary, and said Albert B. Hoyt is Treasurer of the combination known as Local No. 10, United Hatters of North America, hereinafter mentioned, and were and are agents of the other defendants in doing the acts hereinafter described, and many of the other defendants are members of said Local No. 10. Said Charles Moore is President, said James Whitney is Vice President, said William Brennan is Secretary, and said Homer Rockwell is Treasurer of the combination known as Local No. 15, United Hatters of North America, hereinafter mentioned, and were and are agents of the other defendants in doing the acts hereinafter described, and many of the other defendants are members of said Local No. 15. Said John E. Paul is President, said Charles Flynn is Vice President, said John W. Sculley is Secretary, and said Stephen Carlin is Treasurer of the combination known as Local No. 16, United Hatters of North America, hereinafter mentioned, and were and are agents of the other defendants in doing the acts hereinafter described, and many of the other defendants are members of said Local No. 16. And each and all of the several defendants named in this suit was and were, and is and are, the agents of each and all of said defendants in doing the acts hereinafter described. Said William C. Hennelly and Daniel P. Kelley, together with one F. J. Ohare and one C. J. Lee, are special traveling agents of the other defendants, named in this suit, in doing the acts hereinafter described.

2. The plaintiffs who reside in Danbury in the State and District of Connecticut, are co-partners, located and doing business as manufacturers and sellers of hats at said Danbury, under the firm name of D. E. Loewe & Co.

3. At said Danbury, the plaintiffs have a factory for the making of hats, for sale by them in the various States of the Union, and have for many years employed, at said factory, a large number of men in the manufacture and sale of said hats, and have invested in that branch of their business a large amount of capital, and in their business of selling the product of their factory and filling orders for said hats, have built up and established a large inter-state trade, employing more than two hundred and thirty (230) persons, in making and annually selling hats of a value exceeding four hundred thousand (\$400,000) dollars.

4. The plaintiffs deeming it their right to manage and conduct their business without interference, from individuals or associations not connected therewith, have for many years, maintained the policy of refusing

to suffer or permit any person or organization to direct or control their said business, and in consequence of said policy, have conducted their said business upon the broad and patriotic principle of not discriminating against any person seeking employment because of his being or not being connected with any labor or other organization, and have refused to enter into agreement with any person or organization whereby the rights and privileges, either of themselves or any employee would be jeopardized, surrendered to or controlled by said person or organization, and have believed said policy, which was and is well known to the defendants, to be absolutely necessary to the successful conduct of their said business and the welfare of their employees.

5. The plaintiffs, for many years, have been and now are engaged in trade and commerce among the several States of the Union, in selling and shipping almost the whole of the product of their said factory by common carriers, from said Danbury to wholesale dealers residing and doing business in each of the States of Maine, Massachusetts, Rhode Island, New York, New Jersey, Pennsylvania, Maryland, Virginia, Ohio, Illinois, Michigan, Wisconsin, Missouri, Nebraska, Arkansas, California, and other States, to the amount of many hundreds of thousands of dollars, and in sending agents with samples from said Danbury into and through each of said States to visit said wholesale dealers at their places of business in said several States, and solicit and procure from them, orders for said hats, to be filled by hats to be shipped from their said factory at said Danbury, by common carriers to said wholesale dealers, to be by them paid for after the delivery thereof at their several places of business.

6. On July 25th, 1902, the amount of capital invested by the plaintiffs in said business of making and selling hats, approximated one hundred and thirty thousand dollars, and the value of the hats annually sold and shipped by them in previous years, to said dealers in States other than Connecticut, exceeded four hundred thousand dollars, while the value of hats sold by them in the State of Connecticut did not exceed ten thousand dollars.

7. On July 25th, 1902, the plaintiffs had made preparation to do a large and profitable business with said wholesale dealers in other States, and the conditions of their business were such as to warrant the full belief that the ensuing year would be the most successful in their experience. Their factory was then running to its full capacity in filling a large number of orders from such wholesale dealers in other States. They were then employing about one hundred and sixty men in the making and finishing departments, a large number in the trimming and other departments, whose work was dependent upon the previous work of the makers and finishers, and they then had about one hundred and fifty dozens of hats in process of manufacture, and in such condition as to be perishable and ruined if work was stopped upon them.

8. The plaintiffs then were and now are almost wholly dependent upon the sale and shipments of hats as aforesaid, to said dealers in States other than Connecticut, to keep their said factory running and to dispose of its product and their capital in said business profitably employed, and the restraint, curtailment and destruction of their said trade and commerce with their said customers in said States other than Connecticut, by the combination, conspiracy and acts of the defendants, as hereinafter set forth, have been and now are of serious damage to the property and business of the plaintiffs, as hereinafter set forth.

9. The individual defendants, named in this writ, are all members of a combination or association of persons, styling themselves the United Hatters of North America, and said combination includes more than nine thousand persons, residing in the several States of Massachusetts, Connecticut, New York, New Jersey, Pennsylvania, Indiana, Illinois, Missouri, California, and in the Province of Ontario in the Dominion of Canada. Said combination is sub-divided into twenty sub-combinations, each of which is by themselves styled a local Union of The United Hatters of North America. Six of said sub-combinations are in the State of Connecticut, and known as local Unions, 1, and 2, 10 and 11, and 15 and 16 of the United Hatters of North America, and have an aggregate membership of more than three thousand persons residing in the State of Connecticut.

10. Said combination of persons collectively known as the United Hatters of North America, owns, controls, edits, publishes, and issues a paper styled The Journal of the United Hatters of North America, in which are published reports of many of the acts of its agents, hereinafter mentioned, which circulate widely among its members and the public, and which affords a ready, convenient, powerful and effective vehicle for the dissemination of information to its members and the public as to boycotts declared and pushed by them, and of the acts and measures of its members and agents for carrying such boycotts into effect, and was so used by them in connection with the acts of the defendants hereinafter set forth.

11. Said combination owns and absolutely controls the use of a certain label or distinguishing mark, which it styles the Union Label of the United Hatters of North America, which mark, when so used by them, affords to them a ready, convenient, and effective instrument and means of boycotting the hats of any manufacturer against whom they may desire to use it for that purpose.

12. The defendants in this suit are also all members of a combination or association of persons calling themselves and known as The American Federation of Labor, which includes more than a million and four hundred thousand members residing in the several States and Territories of the Union, and in the Dominion

of Canada, and in all the places in the several States, where the wholesale dealers of hats, hereinbefore mentioned, and their customers, reside and do business. Said combination is sub-divided into subordinate groups or combinations, comprising one hundred and ten national and international unions or combinations, of which the said combination of persons styling themselves the United Hatters of North America, is one, composed of twelve thousand local unions, twenty-eight state federations or combinations, more than five hundred central labor unions or combinations, and more than two thousand local unions or combinations, which are not included in the above mentioned national and international combinations.

13. Said combination of persons collectively known as the American Federation of Labor, owns, controls, edits, publishes, and issues a paper or magazine called the American Federationist, which it declares to be its official organ and mouthpiece, which has a very wide circulation among its members and others, and which affords a ready, convenient, powerful and effective vehicle and instrument for the dissemination of information, as to persons, their products and manufactures, boycotted or to be boycotted, by its members, and as to measures adopted and statements to be published, detrimental to such persons and to the sale of their manufactures and for boycotting such persons, their manufactures and business; and said paper has been and now is constantly used, printed and distributed for said purposes among its members and the public, and was so used by the defendants and their confederates in boycotting the product of the firms of F. Berg & Co., of Orange, New Jersey, and H. H. Roelofs & Co., of Philadelphia, Pa., hat manufacturers, to their very great injury and until the said firms successively yielded to their demands in pursuance of the general scheme of the defendant hereinafter set forth.

14. The persons united in said combination, known as the American Federation of Labor, including the persons in said sub-combination known as the United Hatters of North America, constantly employ more than one thousand agents in the States and Territories of the United States, to push, enforce and carry into effect all boycotts declared by the said members, including those in aid of the combined scheme, purpose and effort hereinafter stated, to force all the manufacturers of fur hats in the United States including the plaintiffs, to unionize their factories, by restraining and destroying their inter-state trade and commerce, as hereinafter stated, all of which said agents act under the immediate supervision and personal direction of one Samuel Gompers, who is chief agent of the said combination of persons for said purpose, and of each of the said sub-combinations, and the said agents make monthly reports of their doings, in pushing and enforcing and causing to be pushed and enforced said boycotts, and publish the same monthly in said paper known as the American Federationist, of which he is the editor, appointed by the said members, which said paper in connection with said statement or summary, is declared to be the authorized and official mouthpiece of each of said sub-combinations, including the said United Hatters of North America. Said statement is declared by the defendants to be a faithful record of the doings of said agents, and each of said statements, made during the period covered by the acts of the defendants against the plaintiffs herein stated, contains the announcement to the members of said combination and the public, that all boycotts declared by them are being by them and their agents pushed, enforced and observed.

15. Said combination of persons collectively known as The American Federation of Labor, of which the defendants are members, was by the defendants and their other members, formed for the purpose, among others, of facilitating the declaration and successful maintenance of boycotts, by and for said combination of persons known as the United Hatters of North America, acting through the said Federation of Labor and its other component parts or members, and it and its component parts have frequently declared boycotts, at the request of the defendants, against the business and product of various hat manufacturers, and have vigorously prosecuted the same by and through the powerful machinery at their command as aforesaid, in carrying out their general scheme herein stated, to the great damage and loss of business of said manufacturers, and particularly during the years 1901 and 1902, they declared, prosecuted and waged, at the request of the defendants and their agents, a boycott against the hats made by and the business of H. H. Roelofs & Co., of Philadelphia, Pa., until, by causing them great damage and loss of business, they coerced them into yielding to the demand of the defendants and their agents, that the said factory of said Roelofs & Co. be unionized, as termed by the defendants, and into agreeing to employ, and employing exclusively, members of their said combination in the making and finishing departments of said factory, and in large measure, surrendering to the defendants and their agents, the control of said factory and business, all of which was well known to the plaintiffs, their customers, wholesale dealers and the public, and was, by the defendants and their agents, widely proclaimed through all their agencies above mentioned, in connection with their acts against the plaintiffs, as hereinafter set forth, for the purpose of intimidating and coercing said wholesale dealers and their customers from buying the hats of the plaintiffs, by creating in their minds the fear that the defendants would invoke and put into operation against them, all said powerful means, measures and machinery, if they should handle the hats of the plaintiffs.

16. The defendants, together with the other persons united with them in said combination known as the United Hatters of North America, have been for many years, and now are, engaged in a combined

scheme and effort to force all manufacturers of fur hats in the United States, including the plaintiffs, against their will and their previous policy of carrying on their business, to organize their workmen in the departments of making and finishing, in each of their factories, into an organization, to be part and parcel of the said combination known as the United Hatters of North America, or as the defendants and their confederates term it, to unionize their shops, with the intent thereby to control the employment of labor in and the operation of said factories, and to subject the same to the direction and control of persons, other than the owners of the same, in a manner extremely onerous and distasteful to such owners, and to carry out such scheme, effort and purpose, by restraining and destroying the inter-state trade and commerce of such manufacturers, by means of intimidation of and threats made to such manufacturers and their customers in the several States, of boycotting them, their product and their customers, using therefor all the powerful means at their command as aforesaid, until such time as from the damage and loss of business resulting therefrom, the said manufacturers should yield to the said demand to unionize their factories.

17. The defendants and other members of said United Hatters of North America, acting with them and in pursuance of said general combined scheme and purpose, and in carrying the same into effect against said manufacturers, including the plaintiffs, and by use of the means above stated, and the fear thereof, have, within a very few years, forced the following named manufacturers of hats in the United States, to yield to their demands, and unionize their factories, viz:

Austin, Drew & Co., Orange; A. C. Adams, Phila.; J. B. Allen, San Francisco; M. Budish, Newark; Bornheim & Strause, Phila.; M. Bonbau, Newark; F. Berg & Co., Orange; Louis Boselli, Paterson; Burgess & Co., Newark; Boutelier & Carr, Newark; Brennan, Carr & Co., Orange; Burgesser & Co., Newark; Crimond Bros., Newark; Fred. S. Crane, Newark; Cohen & Greene, Newark; F. Cummings, Son & Co., Orange; Connett & Co., Newark; E. V. Connett & Co., Orange; Charles W. Dempster & Co., Chicago; B. Daly Hat Manufacturing Co., Newark; Fishman & Co., Newark; R. & L. Feldstein, New York; F. Fouratt, Millburn; Joseph Fisch, Newark; Joseph A. Heath, Hoboken; I. C. Hedden, Newark; Hackettstown Hat Works, Hackettstown; Johnson & Hannoeh, Newark; F. Kridel Newark; J. M. Klappolz, Newark; J. H. Long, Newark; G. F. Lewis, Jersey City; Morris Mandel, Newark; Miller, Newark; Samuel Munheim Co., Brooklyn; E. A. Mallory & Sons, Danbury; Edward Murphy, Brooklyn; Monarch Hat Co., Newark; Nichols & Co., Newark; Napier & Mitchell, Bellville; Price & Voght, Phila.; Pfeiffer & Co., Newark; H. D. Parmlee & Co., Newark; Penfield & Griffin Co., Bridgeport; Pacific Coast Hat Works, San Francisco; Joseph A. Parker, Boston; Priluker, Newark; Pioneer Hat Works, Wabash; Arthur Roelofs & Co., Phila.; Redwing Hat Manufacturing Co., Redwing; C. B. Rutan & Co., West Orange; Frank Schoble & Co., Phila.; Stegman & Co., Newark; The Sigler Hat Co., Phila.; F. Smith & Son, Orange; Thomas Smith, Newark; Stewart & Smyth, Newark; Albert Sitz & Son, Newark; Shaw, Kerr & Co., Orange; Smith & Co., Newark; Silberstein & Flexner, Newark; Trimble-Cless Hat Co., Orange; Uniglicht & Co., Newark; O. Willegerod, Newark; E. R. Wessels, Jersey City; Westchester Hat Co., Yonkers; Wosnitzer & Co., Newark; Leigh Whittaker, South Norwalk; George B. Wells, Phila.; M. Yudisky, Newark; and until there remained, according to the statements of the defendants, only twelve hat factories in the United States which have not submitted to their said demands, and the defendants in pursuing their warfare against the plaintiffs, as hereinafter set forth, and in connection with their said acts against them, have made public announcement of that fact and of the firms so coerced by them, in order thereby to increase the effectiveness of their acts in intimidating said wholesale dealers and their customers in States other than Connecticut, from buying hats from the plaintiffs, as hereinafter set forth.

18. To carry out said scheme and purpose, the defendants have appointed and employed and do steadily employ, certain special agents to act in their behalf, with full and express authority from them and the other members of said combination, and under explicit instructions from them, to use every means in their power, to compel all such manufacturers of hats to so unionize their factories, and each and all of the defendants in this suit did the several acts hereinafter stated, either by themselves or their agents, by them thereto fully authorized.

19. On or about March 1st, 1901, in pursuance of said general scheme and purpose, the defendants and the other members of said combination, The United Hatters of North America, through their agents, the said John A. Moffitt, Martin Lawler, John Phillips, James P. Maher and Charles J. Barrett, who acted for themselves and the other defendants, demanded of the plaintiffs that they should unionize their said factory, in the making and finishing departments, and also thereby acquire the right to use and use, the said Union label, subject to the right of the defendants to recall the same at pleasure, in all hats made by them, and then notified the plaintiffs that if they failed to yield to said demand, the defendants and all the other members of the said combination known as the United Hatters of North America, would resort to their said usual and well known methods to compel them so to do. After several conferences, and in April, 1901, the plaintiffs replied to the said demand of the defendants as follows:

"Firmly believing that we are acting for the best interests of our firm, for the best of interests of those whom we employ, and for the best interests of Danbury, by operating an independent or open factory, we

hereby notify you that we decline to have our shop unionized, and if attacked, shall use all lawful means to protect our business interests."

The plaintiffs were then employing many union and non-union men, and their said factory was running smoothly and satisfactorily both to the plaintiffs and their employees. The defendants, their confederates and agents, deferred the execution of their said threat against the plaintiffs until the conclusion of their attack made in pursuance of the same general scheme and purpose against H. H. Roelofs & Co., which resulted in the surrender of Roelofs & Co. on July 15th, 1902, except that the defendants, their confederates and agents, in November, 1901, caused the said American Federation of Labor to declare a boycott against any dealer or dealers who should handle the product of the plaintiffs.

20. On or about July 25th, 1902, the defendants individually and collectively, and as members of said combinations and associations, and with other persons whose names are unknown to the plaintiffs, associated with them, in pursuance of the general scheme and purpose aforesaid, to force all manufacturers of fur hats, and particularly the plaintiffs, to so unionize their factories, wantonly, wrongfully, maliciously, unlawfully and in violation of the provisions of the "Act of Congress, approved July 2, 1890," and entitled "An Act to Protect Trade and Commerce Against Unlawful Restraints and Monopolies," and with intent to injure the property and business of the plaintiffs, by means of acts done which are forbidden, and declared to be unlawful, by said Act of Congress, entered into a combination and conspiracy to restrain the plaintiffs and their customers in States other than Connecticut, in carrying on said trade and commerce among the several States, and to wholly prevent them from engaging in and carrying on said trade and commerce between them, and to prevent the plaintiffs from selling their hats to wholesale dealers and purchasers in said States other than Connecticut, and to prevent the said dealers and customers in said other States from buying the same, and to prevent the plaintiffs from obtaining orders for their hats from such customers, and filling the same, and shipping said hats to said customers in said States as aforesaid, and thereby to injure the plaintiffs in their property and business and to render unsaleable the product and output of their said factory, so the subject of interstate commerce, in whosoever's hands the same might be or come, through said interstate trade and commerce, and to employ as means to carry out said combination and conspiracy and the purposes thereof, and accomplish the same, the following measures and acts, viz:

To cause, by means of threats and coercion, and without warning or information to the plaintiffs, the concerted and simultaneous withdrawal of all the makers and finishers of hats then working for them, who were not members of their said combination, The United Hatters of North America, as well as those who were such members, and thereby cripple the operation of the plaintiffs' factory, and prevent the plaintiffs from filling a large number of orders then on hand, from such wholesale dealers in States other than Connecticut, which they had engaged to fill and were then in the act of filling, as was well known to the defendants; in connection therewith to declare a boycott against all hats made for sale and sold and delivered, or to be so sold or delivered, by the plaintiffs to said wholesale dealers in States other than Connecticut, and to actively boycott the same and the business of those who should deal in them, and thereby prevent the sale of the same by those in whose hands they might be or come through said interstate trade in said several States; to procure and cause others of said combinations united with them in said American Federation of Labor, in like manner to declare a boycott against and to actively boycott the same and the business of such wholesale dealers as should buy or sell them, and of those who should purchase them from such wholesale dealers; to intimidate such wholesale dealers from purchasing or dealing in the hats of the plaintiffs by informing them that the American Federation of Labor had declared a boycott against the product of the plaintiffs and against any dealer who should handle it, and that the same was to be actively pressed against them, and by distributing circulars containing notices that such dealers and their customers were to be boycotted; to threaten with a boycott those customers who should buy any goods whatever, even though union made, of such boycotted dealers, and at the same time to notify such wholesale dealers that they were at liberty to deal in the hats of any other non-union manufacturer of similar quality to those made by the plaintiffs, but must not deal in the hats made by the plaintiffs under threats of such boycotting; to falsely represent to said wholesale dealers and their customers, that the plaintiffs had discriminated against the union men in their employ, had thrown them out of employment because they refused to give up their union cards and teach boys, who were intended to take their places after seven months' instruction, and had driven their employees to extreme measures "by their persistent, unfair and unAmerican policy of antagonizing union labor, forcing wages to a starvation scale, and giving boys and cheap unskilled foreign labor preference over experienced and capable union workmen," in order to intimidate said dealers from purchasing said hats by reason of the prejudice thereby created against the plaintiffs and the hats made by them, among those who might otherwise purchase them; to use the said union label of said The United Hatters of North America, as an instrument to aid them in carrying out said conspiracy and combination against the plaintiffs' and their customers' interstate trade aforesaid, and in connection with the boycotting above mentioned, for the purpose of describing and identifying the hats of the plaintiffs, and singling them out to be so boycotted; to employ

a large number of agents to visit said wholesale dealers and their customers, at their several places of business, and threaten them with loss of business if they should buy or handle the hats of the plaintiffs, and thereby prevent them from buying said hats, and in connection therewith to cause said dealers to be waited upon by committees representing large combinations of persons in their several localities to make similar threats to them; to use the daily press in the localities where such wholesale dealers reside, and do business, to announce and advertise the said boycotts against the hats of the plaintiffs and said wholesale dealers, and thereby make the same more effective and oppressive, and to use the columns of their said paper, the Journal of the United Hatters of North America, for that purpose, and to describe the acts of their said agents in prosecuting the same.

21. Afterwards, to wit, on July 25th, 1902, and on divers days since hitherto, the defendants in pursuance of said combination and conspiracy, and to carry the same into effect, did cause the concerted and simultaneous withdrawal, by means of threats and coercion made by them, and without previous warning or information thereof to the plaintiffs, of all but ten of the non-union makers and finishers of hats then working for them, as well as all of their union makers and finishers, leaving large numbers of hats in an unfinished and perishable condition, with intent to cripple and did thereby cripple the operation of the plaintiffs' factory until the latter part of October, 1902, and thereby prevented the plaintiffs from filling a large number of orders then on hand from such wholesale dealers in States other than Connecticut, which they had engaged to fill and were then in the act of filling, as was well known to the defendants, and thereby caused the loss to the plaintiffs of many orders from said wholesale dealers in other States, and greatly hindered and delayed them in filling such orders, and falsely representing to said wholesale dealers, their customers, and the public generally in States other than Connecticut, that the plaintiffs had discriminated against the union men in their employ, and had discharged or thrown out of employment their union men in August, 1902, that they had driven their employees to extreme measures by their persistent, unfair and unAmerican policy of antagonizing union labor, forcing wages down to a starvation scale and giving boys and cheap, unskilled foreign labor preference over experienced and capable workmen; that skilled hatters had been discharged from said factory for no other cause than their devotion and adherence to the principles of organized labor in refusing to give up their union cards, and to teach the trade to boys who were intended to take the place of union workmen after seven months' instruction, and that unable to submit longer to a system of petty tyrannies that might be tolerated in Siberia but could not be borne by independent Americans, the workmen in the factory inaugurated the strike to compel the firm to recognize their rights, in order to prejudice, and did thereby prejudice the public, against the plaintiffs and their product, and in order to intimidate, and did thereby intimidate said wholesale dealers and their customers, in States other than Connecticut, from purchasing hats from the plaintiffs by reason of the fear of the prejudice created against said hats; and in connection therewith declared a boycott against all hats made for and so sold and delivered, and to be so sold and delivered to said wholesale dealers, in States other than Connecticut, and actively boycotted the same and the business of those who dealt in them in such other States, and thereby restrained and prevented the purchase of the same from the plaintiffs, and the sale of the same by those in whose hands they were, or might thereafter be, in the course of such inter-state trade, and caused and procured others of said combinations united with them in the said American Federation of Labor to declare a boycott against the plaintiffs, their product and against the business of such wholesale dealers in States other than Connecticut, as should buy or sell them, and of those who should purchase from such wholesale dealers any goods whatever, and further intimidated said wholesale dealers from purchasing or dealing in the hats made by the plaintiffs, as aforesaid, by informing them that the American Federation of Labor had declared a boycott against the hats of the plaintiffs and against any dealer who should handle them, and that said boycott was to be actively pressed against them, and by sending agents and committees from various of said labor organizations, to threaten said wholesale dealers and their customers with a boycott from them if they purchased or handled the goods of the plaintiffs, and by distributing in San Francisco, California, and other places, circulars containing notices that such dealers and their customers were to be boycotted, and threatened with a boycott, and did actively boycott the customers who did or should buy any goods whatever, even though union made, of such wholesale dealers so boycotted, and used the daily press to advertise and announce said boycott and the measures taken in pursuance thereof by said labor organizations, particularly the San Francisco Bulletin, in its issues of July 2d and July 4th, 1903, and a daily paper published in Richmond, Virginia, on December 10th, 1902, and notified such wholesale dealers in States other than Connecticut, that they were at liberty to deal in the hats of any other non-union hat manufacturers of similar quality to those of the plaintiffs, but that they must not deal in the hats made by the plaintiffs, under threats of being boycotted for so doing, and used the said union label of the United Hatters of North America as an instrument to aid them in carrying out said combination and conspiracy against the plaintiffs' and their customers' inter-state trade as aforesaid, and in connection with such boycotting by using the same and its absence from the hats of the plaintiffs, as an insignia or device to indicate to the purchaser that the hats of the plaintiffs were to be boycotted, and to point them out for that purpose, and employed a large number of agents to visit said wholesale dealers and their customers at their

several places of business in each of said States, particularly in Philadelphia and other places in the State of Pennsylvania, in Baltimore in the State of Maryland, in Richmond and other places in the State of Virginia, and in San Francisco and other places in the State of California, to intimidate and threaten them, if they should continue to deal in or handle the hats of the plaintiffs, and among many other instances of like kind, the said William C. Hennelly and Daniel P. Kelley in behalf of all of said defendants and acting for them, demanded of the firm of Triest & Co., wholesale dealers in hats, doing business in said San Francisco, that they should agree not to buy or deal in the hats made by the plaintiffs, under threats made by them to said firm of boycotting their business and that of their customers, and upon their refusing to comply with such demand and yield to said threats, the defendants by their said agents, caused announcement to be made in the newspapers of said city that said Triest & Co., were to be boycotted therefor, and that the labor council of San Francisco would be addressed by them for that purpose, and that they had procured a boycott to be declared by said labor council, and thereupon the defendants, through their said agents, Hennelly and Kelley, printed, published, issued and distributed to the retail dealers in hats, in the several States upon the Pacific coast, the following circular, to wit:

"SAN FRANCISCO LABOR COUNCIL.

Affiliated with the American Federation of Labor, Secretary's Office, 927 Market Street,
Rooms 405, 406, 407 Emma Spreckel's Building.
Meets every Friday, at 1159 Mission St. Telephone, South 447.
Address all communications to 927 Market Street.

San Francisco, July 3, 1903.

To whom it may concern:

At a special meeting of the San Francisco Labor Council held on the above date, the hat jobbing concern known as Triest & Co., 116 Sansome St., San Francisco, was declared unfair for persistently patronizing the unfair hat manufacturing concern of D. E. Loewe & Co., Danbury, Connecticut, where the union hatters have been on strike, for union conditions, since August 20th, 1902. Triest & Co., will be retained on the unfair list as long as they handle the product of this unfair hat manufacturing concern. Union men do not usually patronize retail stores who buy from unfair jobbing houses or manufacturers. Under these circumstances, all friends of organized labor, and those desiring the patronage of organized workers, will not buy goods from Triest & Co., 116 Sansome St., San Francisco.

Yours respectfully,

T. E. ZANT,
Secretary, S. F. Labor Council.
W. C. HENNELLY,
D. F. KELLEY, Representing United Hatters of North America."

G. B. BENHAM, President,
S. F. Labor Council. [L. S.]

Also the following, to wit:

"SAN FRANCISCO LABOR COUNCIL.

Affiliated with the American Federation of Labor, Secretary's Office, 927 Market Street,
Rooms 405, 406, 407 Emma Spreckel's Building.
Meets every Friday at 1159 Mission St. Telephone, South 447.
Address all communications to 927 Market street.

San Francisco, July 14, 1903.

Messrs.

Gentlemen: We beg leave to call your attention to the following products which are on the unfair list of the American Federation of Labor:

We do this in order that you refrain from handling these goods, as the patronage of the firms named below is taken by the organized workers as an evidence of a desire to patronize those who are opposed to the interests of organized labor. The declaration of unfairness regarding the firms mentioned is fully sanctioned and will be supported to the fullest degree by the San Francisco Labor Council.

Trusting that you will be able to avoid the handling of these goods in the future, we are

Yours respectfully,

T. E. ZANT, Secretary.

G. B. BENHAM, President. [L. S.]

UNFAIR LIST.

Loewe & Co., Danbury, Conn., and Triest & Co., 116 Sansome st., San Francisco, Hat Manufacturers;
Cluett, Peabody & Co., Shirts and Collars, Troy, New York, and 562 Mission st., San Francisco, Cal.;
United Shirt & Collar Co., Troy, New York, and 25 Sansome st., San Francisco, Cal.;
VanZandt, Jacobs & Co., Troy, New York, Greenbaum, Weil & Michaels, Selling Agents, 27 Sansome st., San Francisco, Cal.;"

and caused said circulars to be mailed to and personally delivered to the retail dealers in hats, and the other customers of said Triest & Co., upon the Pacific coast, and to many others, thereby causing the loss of many orders and customers to said Triest & Co., and to the plaintiffs, for the purpose of intimidating and coercing the said Triest & Co., not to deal with the plaintiffs, and thereby caused the loss of many orders and customers to said Triest & Co., and to the plaintiffs.

22. By means of each and all of said acts done by the defendants in pursuance of said combination and conspiracy, they have greatly restrained, diminished, and, in many places, destroyed the trade and commerce of the plaintiffs with said wholesale dealers, in said States other than Connecticut, by the loss of many orders and customers directly resulting therefrom, and the plaintiffs have been injured in their business and property by reason of said combination and conspiracy, and the acts of the defendants done in pursuance thereof, and to carry the same into effect, which are declared to be unlawful by said Act of Congress, to the amount of eighty thousand (\$80,000) dollars.

23. The defendants are now engaged in actively prosecuting said combination and conspiracy, and in carrying the same into effect against the plaintiffs and their said business, by use of the various means and measures hereinbefore stated, and threaten and intend to continue and will continue the same, to the very great damage and total destruction of the business of the plaintiffs, unless restrained by a perpetual injunction.

Second Count.

1. All the paragraphs of the first count are made part of this count.

2. On or about July 25th, 1902, and at divers times since hitherto, the defendants individually and collectively and, with others whose names are unknown to the plaintiffs, associated with them, wantonly, wrongfully and maliciously entered into a combination and conspiracy to prevent the plaintiffs from carrying on their lawful business in supplying the product of their manufacturing establishment to their customers and others in the State of Connecticut and the other States of the Union, desiring to purchase from them, and to destroy their business and patronage and the good will and profits thereof, and to tie up and render useless their capital and plant, unless and until the plaintiffs should comply with their said unjust and unlawful demands, and to use as means to accomplish that end, all the said means, measures and acts which have for their object the prevention of the sale of the plaintiffs' product to the general public through their customers; and in pursuance of said combination and conspiracy, and to carry the same into effect and accomplish its purpose, the defendants did the several acts complained of, which have greatly crippled, injured and impaired the plaintiffs' said business to the extent of \$80,000, and are now doing said acts, and threaten and intend to continue to do them until the plaintiffs' business shall be wholly ruined and destroyed to the irreparable loss of the plaintiffs.

The plaintiffs claim :

1. An injunction to restrain the defendants, acting by themselves or through any agent whatever, from carrying out their said conspiracy to restrain and destroy the inter-state trade of the plaintiffs, and their said conspiracy to prevent the plaintiffs from carrying on their lawful business, and from threatening, declaring or continuing a boycott against the plaintiffs, the product of their factory or their customers, and from threatening or intimidating the customers of the plaintiffs, by any of the means alleged in the complaint, and from doing any of said acts in aid of such conspiracies, and from injuring the business of the plaintiffs thereby.

2. \$100,000 damages.

And you are hereby further commanded to leave a true and attested copy of this writ and of the accompanying complaint, at least twelve days before the session of the Court, to which it is made returnable, with The Danbury National Bank, The City National Bank, The Savings Bank of Danbury, and The Union Savings Bank of Danbury, corporations duly organized and located and having their principal places of business in said Danbury, and The Fairfield County Savings Bank, Norwalk Savings Society, South Norwalk Savings Bank, National Bank of Norwalk, Fairfield County National Bank, Central National Bank, and City National Bank of South Norwalk, corporations duly organized and located and having their principal place of business in said town of Norwalk, and with each of them, as they are the agents, trustees and debtors of each of said defendants and are indebted to them.

I hereby certify that I have personal knowledge of the financial responsibility of the plaintiffs and deem it sufficient to pay all costs in this action.

Of this writ, with your doings thereon, make due service and return.

Dated at Bridgeport, Connecticut, this 1st day of September, A. D. 1903.

DANIEL DAVENPORT,
Commissioner of the Superior Court for Fairfield County.

FAIRFIELD COUNTY, ss. Bridgeport, September , 1903.

The within and foregoing is a true and attested copy of the original writ and complaint.

Attest,

.....
Deputy Sheriff for Fairfield County.

Know all Men by these Presents, THAT I Charles F. Starr of Danbury in Fairfield County Connecticut as sole surviving administrator with the will annexed on the estate of Aaron Seely late of said Danbury, deceased -

For the consideration of the payment in full of a mortgage ~~Dollars~~ Note received to my full satisfaction of

Peter McGlone of said Danbury Do by these presents remise, release and forever Quit Claim unto the said *Peter McGlone*

all right, title, interest, claim and demand whatever, which I the said releasor have or ought to have in or to a certain piece of land situate on Lovers Lane in said Danbury, bounded North by said Lovers Lane, East by land of Peter McGlone South by Beulah Street, and West by land of said or formerly belonging to the estate of Aaron Seely, which said land was mortgaged to the releasor by deed dated April 18th 1884, and recorded in Book 77 page 574 of the Danbury Land Records,

To Have and to Hold, the premises with all the appurtenances unto the said releasee his heirs and assigns forever, so that neither I the said releasor, nor my heirs, nor any other person under me or them, shall hereafter have any claim, right or title in or to the premises, or any part thereof; but therefrom I and they are by these presents forever barred and secluded.

In Witness Whereof, I have hereunto set my hand and seal the 20th day of March A. D. 1886

SIGNED, SEALED AND DELIVERED IN THE PRESENCE OF

Beneget A. Nough
Granville O. Holmes

Chas F. Starr { l. s. }
Sole surviving Admin { l. s. }
istrator on estate of { l. s. }
Aaron Seely { l. s. }

FAIRFIELD COUNTY, SS., DANBURY, March 20 A. D. 1886
Personally appeared *Charles F. Starr* signer and
sealer of the foregoing instrument, and acknowledged the same to be his free act and deed before me.

Beneget A. Nough
Notary Public

A TRUE RECORD OF THE ORIGINAL,
Recorded at 7:40 P. M. Sept. 23rd A. D. 1886

Attest, *George W. Waterman* Town Clerk.

✓

Know all Men by these Presents, THAT I Joseph J. Bates of
Danbury Fairfield County. Connecticut

For the consideration of *the payment of a mortgage note*
received to *my* full satisfaction of *Peter Mellylowe of said*
Danbury

✓ Do by these presents remise, release and forever Quit Claim unto the said *Peter Mellylowe*

all right, title, interest, claim and demand whatever, which I the
said releasor have or ought to have in or to *all those premises in said*
Danbury, mortgaged to me by mortgage deed
recorded in Danbury Land Records Vol 84 page
153 reference thereto being had, Intending
herby to release and discharge said mortgage

Seelery

To Have and to Hold, the above premises, with *the* appurtenances unto the said releasee *his* heirs and assigns
forever, so that neither I the said releasor nor *my* heirs, nor any other
person under *me* or them shall hereafter have any claim, right or title in or to the premises, or any
part thereof; but therefrom I and they are by these presents forever barred and secluded.

IN WITNESS WHEREOF, I have hereunto set *my* hand and seal the *9th* day of
April A. D. 189/

SIGNED, SEALED AND DELIVERED }
IN PRESENCE OF

O. P. Merrill
Geo. Wakeman

Joseph J. Bates

{ L. S. }
{ L. S. }
{ L. S. }
{ L. S. }
{ L. S. }

State of Connecticut,
Fairfield County, ss., Danbury, *April 9* A. D. 189/.

Personally appeared *Joseph J. Bates* signer and
sealer of the foregoing instrument, and acknowledged the same to be *his* free act and deed, before me,

A TRUE RECORD OF THE ORIGINAL.

Geo. Wakeman
Justice of the Peace.
Commissioner of the Superior Court.
Notary Public.

Recorded at *P¹⁰ P* M. *April 9th* A. D. 189/.

Attest, *George Wakeman* Town Clerk.

CERTIFICATE AS TO REAL ESTATE.

STATE OF CONNECTICUT)
COUNTY OF FAIRFIELD) SS: PROBATE DISTRICT OF GREENWICH:

This is to certify that DELLA K. NEWMAN, of the town of Greenwich, in said District, died on the 19th day of October, 1928, at said Greenwich that said deceased was the owner of real estate located in the Town of Connecticut, and that said deceased left no will.

Greenwich, Connecticut, November 2, 1928.

Certified by

Emil Newman, Administrator.

A true record of the original

Recorded at 11:06 a.m. Nov. 17, 1928.

Attest:

Geo. M. Shelburne

Town Clerk

STATE OF CONNECTICUT)
DISTRICT OF DANBURY) SS: PROBATE COURT, November 14, 1928.

TO WHOM IT MAY CONCERN, This certifies that PETER McGLONE, who last dwelt in the town of Danbury, and who was the owner of real estate situate in the town of Danbury, County of Fairfield, in the State of Connecticut, died on the 12th day of October, A.D. 1928, leaving a last will and testament.

Attest: William B. McGlone

Executor of the will of said deceased.

A true record of the original

Recorded at 11:55 a.m. Nov. 17, 1928.

Attest:

Geo. M. Shelburne

Town Clerk

TO ALL PEOPLE TO WHOM THESE PRESENTS SHALL COME, GREETING: KNOW YE THAT I, FLORENCE M. RUSSELL, of Danbury, Fairfield County, Connecticut, for the consideration of one hundred sixty and no/100 dollars, received to my full satisfaction of HARRIS J. HEYMAN, of said Danbury, do give, grant, bargain, sell and confirm unto the said Harris J. Heyman, a certain piece or parcel of land, with building thereon, situated on Beaver Brook Heights, so-called in said Town of Danbury, and bounded and described as follows:

Northerly by Whitney Avenue, so-called; Easterly by Broad Street, so-called; and Southerly and Westerly by land of Gilbert N. Ballard, being ninety-seven (97) feet on the North line, or Whitney Avenue, seventy-eight (78) feet on the East line, or Broad Street, ninety seven (97) feet on the South line, and ninety-eight (98) feet on the West line.

TO HAVE AND TO HOLD, the above granted and bargained premises, with the privileges and appurtenances, thereof, unto him the said grantee, his heirs and assigns forever, to his and their own proper use and behoof, And also, I the said grantor do for myself my heirs, executors and administrators, covenant with the said grantee, his heirs and assigns, that at and until the ensembling of these presents, I am well seized of the premises, as a good indefeasible estate in fee simple, and have good right to bargain and sell the same in manner and form as is above written; and that the same is free from all incumbrances whatsoever.

AND FURTHERMORE, I the said grantor do by these presents, bind myself and my heirs forever, to warrant and defend the above granted and bargained premises to him the said grantee, his heirs and assigns, against all claims and demands whatsoever.

IN WITNESS WHEREOF, I have hereunto set my hand and seal the 17th day of November, A.D. 1928.

THE CONDITION OF THIS DEED IS SUCH, that whereas the said grantor is justly indebted to the said grantee in the sum of one hundred sixty and no/100 dollars as evidenced by her promissory note for said sum of even date herewith, payable to the order of said grantee in ten monthly installments of \$16.00 each, beginning December 17th, 1928 and continuing thereafter in monthly succession until the full sum shall have been paid together with interest at the rate of 1% per month computed on the unpaid balance and payable with each installment of the principal.

Proviso: With the proviso that if any payment of either principal or interest shall remain unpaid for 30 days after the same is due and payable, then the entire amount of principal and interest remaining unpaid shall immediately become due and payable at the option of the holder hereof, and in the event that foreclosure proceedings are instituted, the costs of foreclosure together with reasonable attorney's fees shall be added to and become part of the Mortgage debt.

NOW THEREFORE, if said note shall be well and truly paid according to its terms then this deed shall be void, otherwise to remain in full force and effect.

Signed, sealed and delivered

in presence of:

Florence M. Russell (L.S.)

Florence E. Harrison

Benjamin Heyman

STATE OF CONNECTICUT)
FAIRFIELD COUNTY) SS: DANBURY, November 17th, A.D., 1928.

Personally appeared FLORENCE M. RUSSELL, signer and sealer of the foregoing instrument and acknowledged the same to be her free act and deed, before me,

(SEAL)

Benjamin Heyman

Notary Public.

A true record of the original

Recorded at 9:00 a.m. Nov. 20, 1928.

Attest:

Geo. M. Shelburne

Town Clerk

*Released Vol. 180 p. 574
Margaret M. Russell - T.C. Clerk*

See Vol. 180 p. 574

*Assigned to
H. S. Heyman Realty Corp.
Vol. 181 p. 521*

Know All Men by these Presents: THAT I, Peter McGlone, of Danbury,
Fairfield County, Connecticut,

for the consideration of One Dollar and other valuable consideration,
received to my full satisfaction of Estate of John McGlone, late of said
Danbury, deceased,

Do by these presents remise, release and forever QUIT CLAIM unto the said Estate of John McGlone,
all right, title, interest, claim and demand whatever which

I the said RELEASOR have or ought to have in or to the following described real estate
located in said Danbury, bounded on the North by South Street: East on
Mountainville Avenue: West by land now or formerly of Peter McGlone: and
South by Seeley Street: being sixty-eight (68) feet wide in front and rear
and about two hundred (200) feet deep, more or less.

This deed is made pursuant to an order of the Superior Court for Fairfield
County in the action of Ann McGlone, Administratrix, et als vs. Peter McGlone,
which action was brought for the purpose of quieting title to said premises.

To Have and to Hold the premises, with all the appurtenances, unto the said RELEASEE its successors
heirs and assigns forever, so that neither I the said RELEASOR nor my heirs, nor any other person under me
or them, shall hereafter have any claim, right or title in or to the premises or any part thereof, but therefrom I and they are
by these Presents forever barred and secluded.

In Witness Whereof I have hereunto set my hand and seal this 9th
day of March A. D. 1918.

Signed, Sealed and Delivered in presence of
Catherine F. Farrell

Martin J. Cunningham

Peter McGlone

[L. S.]
[L. S.]
[L. S.]
[L. S.]
[L. S.]

STATE OF CONNECTICUT,
County of Fairfield,
Town of Danbury,

March 9th A. D. 1918.

Personally appeared Peter McGlone

his signer and sealer of the foregoing instrument, and acknowledged the same to be
free act and deed, before me.

Martin J. Cunningham

Commissioner of Superior Court
for Fairfield County. Notary Public.

A true record of the original

Recorded at 1:55 P.M., March 11, 1918.

Attest, Geo. M. Stebbins Town Clerk