

## **William B. Gould IV Collection**

**Papers, 1971-1981**

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William B. Gould IV was born in Boston July 16, 1936. After graduating from Cornell Law School in 1961, he took a job as assistant general counsel with the United Auto Workers in Detroit. The following year he studied comparative labor law at the London School of Economics, returning to the United States in the mid-sixties to work for the National Labor Relations Board and representing management in labor law matters for a New York law firm. In 1968, he joined the faculty of the Wayne State University Law School. Since March, 1994 he has been on leave from his position as Charles A. Beardsley Professor of Law at Stanford University Law School, an appointment he has held since 1972, while serving as Chairman of the National Labor Relations Board.

William B. Gould IV served as lead counsel in Stamps v. Detroit Edison Co., a class action lawsuit filed in 1971 by the ACLU and Gould on behalf of Edison employee Willie Stamps and the Association for the Betterment of Black Edison Employees. The EEOC later joined the case with a suit against Edison on behalf of Edison employees James Atkinson and Darney Stanfield. Both cases charged the utility with systematic racial discrimination in hiring and promoting African Americans. The suits were later combined. In 1979, after Edison's unsuccessful appeal of U. S. District Judge Damon Keith's ruling, the plaintiffs were finally awarded \$5,350,000, the largest per capita settlement in the history of employment discrimination litigation.

The William B. Gould IV Collection consists of correspondence, clippings, legal briefs, court and meeting proceedings, depositions, and other legal material related to Stamps v. Detroit Edison Co.

### **Important subjects in the collection:**

Afro-Americans--Discrimination in employment  
Association for the Betterment of Black Edison Employees  
Detroit Edison Company  
Discrimination in employment--Law and legislation  
Discrimination in employment--Michigan--Detroit  
Trade unions--Race discrimination  
UAW Local 223  
UAW Local 17

### **Important correspondents in the collection:**

Roger Craig  
Damon Keith  
Sanford Jay Rosen  
Howard Rubin  
Willie Stamps  
Sheldon Stark

## Box 1

- 1-3. U.S. District Court ; court proceedings, 1973 Mar
- 4-6. ; meeting transcript, 1974 May-Sep
- 7. ; brief, plaintiff's answer to interrogatories, 1971 Nov
- 8. ; brief, defendant's answer to interrogatories, 1972 Jul
- 9. ; brief, notice of hearing and motion to dismiss ABBEE  
(Association for the Betterment of Black Edison  
Employees), 1972 Oct
- 10-11. ; brief, motion to dismiss ABBEE for lack of standing, 1972 Oct
- 12. ; brief, answer to motion to dismiss ABBEE as plaintiff, 1972  
Nov
- 13. ; brief, motion to dismiss party plaintiff, 1973 Jan
- 14. ; brief, memorandum order granting motion to dismiss party  
plaintiff, 1973 Jan
- 15. ; brief, pre-trial brief of defendant, 1973 Feb
- 16. ; brief, consent decree, 1973 Feb
- 17. ; brief, support for plaintiff's motion to amend complaint, 1973  
Mar
- 18. ; brief, answer to motion for reconsideration of order dismissing  
ABBEE as plaintiff, 1973 Apr
- 19. ; brief, reply to memorandum of law in support of plaintiff's  
motion to amend complaint, 1973 Apr
- 20. ; brief, motion for rehearing of order dismissing ABBEE as party  
plaintiff, 1973 Apr
- 21. ; brief, memorandum of law, 1973 Apr
- 22. ; brief, order of substitution, 1974 Apr
- 23. ; brief, defendant's fact findings and conclusions of law, 1973  
May
- 24. ; brief, Local 223 brief and arguments following trial, 1973 May
- 25. ; brief, defendant's fact findings and conclusion of law, 1973 May
- 26. ; brief, Local 17 proposed fact findings and conclusion of law,  
1973 May
- 27. ; brief, memorandum of law, 1973 May
- 28. ; brief, plaintiff's finding of fact, 1973 May
- 29. ; brief, memorandum order denying plaintiff's motion to amend  
complaint, 1973 May
- 30. ; brief, memo denying reconsideration of order denying standing  
to party plaintiff, 1973 May
- 31. ; brief, fact finding, conclusions of law, and decree, 1973 May
- 32. ; brief, opposition to Detroit Edison's motion for stay of  
proceedings after appeal, 1973 Oct
- 33. ; brief, plaintiff's reply memorandum of law, 1973 Dec
- 34. ; brief, plaintiffs reply memorandum of law, 1973 Dec

- 35. ; brief, proof of service and support of Local 223 motion for new trial, 1973 Dec
- 36. ; brief, motion for award of attorney's fees and affidavits, 1977 Apr
- 37. ; brief, memorandum of defendant opposing plaintiff's motion for commencement of back pay proceedings, 1977 May

## Box 1 (cont'd)

- 38. U.S. District Court ; brief, memorandum of defendant opposing plaintiffs motion for award of attorney's fees and in support of cross-motion for dismissal or discovery, 1977 May
- 39. ; brief, dismissal of plaintiff's motion for award of attorney's fees or for discovery; and, affidavit opposing plaintiff's motion for back pay proceedings and supporting defendant's cross-motion for dismissal or for discovery, 1977 May
- 40. ; brief, EEOC's proposed order on mandate, 1978 Jan
- 41. ; brief, plaintiff's memorandum supporting its mandate order and in response to orders of other parties, 1978 Feb
- 42. ; brief, final order and decree, 1978 Jul
- 43. ; brief, notice to black persons who unsuccessfully applied for employment at Detroit Edison between 1969-74, c. 1978
- 44. ; brief, memorandum of plaintiff in response to objections of Locals 223 and 17 to the proposed consent order, c. 1978
- 45. ; brief, joint motion for provisional approval of consent order, 1979 Jan
- 46. ; brief, EEOC's memorandum in support of joint motion for provisional approval of consent order, 1979 Jan
- 47. ; brief, supplemental EEOC memorandum in support of motion for approval of consent order, 1979 Jan
- 48. ; brief, Local 17's memorandum objecting to Detroit Edison's and EEOC's proposed consent order, 1979 Jan
- 49. ; brief, approval of parties proposed settlement and consent order, 1979 Aug
- 50. ; brief, approval of proposed settlement and consent order, 1979 Oct
- 51. ; brief, report on proposed settlement and consent order affecting the employee class, 1979 Nov
- 52. ; brief, order approving proposed consent order, 1979 Dec
- 53. ; brief, memorandum opinion on final approval of proposed settlement for the employee class, 1980 May
- 54. ; brief, consent order, 1980 Sep
- 55. ; brief, final approval of proposed settlement for rejected applicants class, 1980 Dec

- 56. ; brief, consent order, 1980 Dec
- 57. ; brief, order, 1980 Dec
- 58. ; brief, defendants response to employee class settlement, c. 1980
- 59. ; brief, motion for payment of attorney fees, 1981 Feb
- 60. ; brief, results of interviews of 87 white employees of Detroit Edison by FBI, n.d.
- 61. ; brief, plaintiff's memorandum for attorney's fees, n.d.
- 62. ; brief, support of motion to deny defendant's motion to dismiss ABBEE as plaintiff, n.d.
- 63. ; brief, proposed decree, n.d.

Box 2

- 1. U.S. District Court ; deposition of Theopolis Carter, 1971 Nov
- 2. ; deposition of Authur Lacey, 1971 Jul
- 3. ; deposition of William Liedal, 1972 Sep
- 4. ; deposition of William Roskind, 1972 Sep
- 5. ; deposition of James P. Vary, 1972 Sep
- 6. ; deposition of Willie Thomas, 1972 Sep
- 7. ; deposition of Emil Ruch, 1972 Sep
- 8. ; deposition of Robert Schwab, 1972 Sep
- 9-12. ; defendant's answer to interrogatories 1-74, n.d.
- 13. ; plaintiffs second interrogatories, 1971 Dec
- 14. ; qualifications of expert witnesses, 1973
- 15. Appendix; USA v. Virginia Electric and Power Company, 1971
- 16. U.S. Court of Appeals ; brief, affidavit of William Gould, 1973 Nov
- 17. ; brief, memorandum of law in support of plaintiff's motion to amend complaint; proceedings from U.VS. district court  
from Jun 5, 1973, 1973 c.
- 18. ; brief, motion for stay pending appeal, 1974 Mar
- 19. ; brief, affidavit of James Brenner in support of application  
for stay, 1974 Mar
- 20. ; brief, affidavit of Robert E. Schwab in support of  
application for stay, 1974 Mar
- 21. ; brief, preliminary statement, 1974 Apr
- 22. ; brief, reply brief in opposition to motion for stay pending  
appeal, 1974 Apr
- 23. ; brief, miscellaneous briefs, 1974 Apr
- 24. ; brief, reply in opposition to motion for stay pending appeal,  
1974 Apr
- 25. ; brief, motion for stay pending appeal, 1974 c.

26. ; brief, support of motion for stay pending appeal, c.1974
27. ; brief, petition for reconsideration for rehearing en banc,  
1975 Mar
28. ; brief, reply to petition of defendant, 1977 Oct
29. ; brief, on behalf of defendant-appellant Local 223, 1978 Nov
30. ; brief, of EEOC as amicus curiae, n.d.
31. ; brief, defendant's reply brief, n.d.
32. U.S. Supreme Court ; petition for writ of certiorari to the U.S. Court of Appeals,  
1975
33. ; Detroit Edison's brief in response to Stamps petition for  
certiorari, 1975
34. ; brief of Stamps in response to locals petitions for certiorari,  
1975
35. ; joint appendix, 1975
36. ; brief for EEOC in opposition, 1975
37. Statement to EEOC by Willie Stamps, 1971
38. Memo; re: Liability of union Locals 223 and 17 in the Detroit Edison Case, from  
Howard Rubin, 1971 Dec
39. EEOC fact finding, 1971 Sep
40. Exhibits, n.d.
41. Correspondence, 1971-81
42. Clippings, 1972-79