

# INTERNATIONAL HARVESTER COMPANY

(INCORPORATED)

180 NORTH MICHIGAN AVENUE

CHICAGO, USA

LAW DEPARTMENT

June 28, 1938.

Mr. H. O. Bercher,  
Works Auditor,  
Wisconsin Steel Works,  
South Chicago, Ill.

Mr. J. C. Ballard,  
Auditor, Coal Mines,  
Benham, Kentucky.

Mr. C. V. Brannen,  
Auditor, Iron Mines,  
Hibbing, Minnesota.

Dear Sirs:

The Wisconsin Steel Company and the International Harvester Company have been sued, one suit by Dominic Perry and the other by Michele Provensano, in the Minnesota Court for the 11th Judicial District. The Complaint in each case is the same, and the contention of each employee is that he paid in certain contributions under the Industrial Accident Department Plan of the International Harvester Company which was in effect May 1, 1910. It was discontinued at the ore mines on September 30, 1913, and in all departments it was discontinued, so far as contributions from employees were concerned, from and after January 1, 1915. At that time the ore mines were operated by the Wisconsin Steel Company, and the Wisconsin Steel Company was one of the parties to the Industrial Accident Department Plan of the International Harvester Company. I understand that the departments of the Wisconsin Steel Company at that time were the South Chicago Steel Mill, the Deering Rolling Mill, the Hawkins Mine, the Agnew Mine, the Benham Coal Mine, and the Coke Works.

I am trying to get statistics showing what the total contributions by employees were in the period from May 1, 1910 to September 30, 1913 in the case of the ore mines, and December 31, 1914 in the case of the other departments. Then I want to find the total amount paid out from the Industrial Accident Department's fund for injuries and disabilities from May 1, 1910 to September 30, 1913. I should also like to find out what were the total payments from the fund from May 1, 1910 to September 30, 1913 for disabilities of less than 30 days.

Most of our records in the Chicago office seem to have been destroyed. I find an old report made by Mr. H. J. Sameit, who is now dead, which shows for the three years ending August 31, 1911, August 31, 1912 and August 31, 1913 the total cost for all accidents at the Hawkins Mine, Agnew Mine, Coal and Coke Works, South Chicago and the Deering Rolling Mill. Mr. Sameit's table also shows the