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INDIANA—continued

Newspaper	Representative	Member
Shelbyville Daily Democrat	Norman Thurston	Democrat Publishing Company.
So. Bend Evening & Sunday Tribune.	F. A. Miller	South Bend Tribune.
Terre Haute Star and Sunday Tribune Star.	F. Birch Ijams	Tribune Star Publishing Company, Inc.
Terre Haute Tribune	Louis F. Keifer	Do.
Vincennes Sun-Commercial	{Howard N. Greenlee. Eugene C. Pulliam}	Vincennes Newspapers, Inc. Do.
Washington Herald	Paul R. Bausman	The Gazette & Herald Company.

IOWA

Boone News Republican	S. G. Goldthwaite	S. G. Goldthwaite.
Burlington Hawk-Eye Gazette	Clarence W. Moddey	The Daily Hawk-Eye Company.
Carroll Daily Times Herald	James W. Wilson	Herald Publishing Company.
Cedar Rapids Gazette & Republican.	{John L. Miller. Jas. M. Faulkes}	The Gazette Company. Do.
Centerville Daily Iowegian & Citizen.	J. M. Beck	J. M. Beck & J. R. Needham.
Charles City Press	Harold S. Henry	L. P. Henry.
Cherokee Daily Times	Justin Barry	Times Publishing Company.
Clinton Herald	A. M. Clapp	Clinton Herald Co.
Council Bluffs Nonpareil	Robert R. O'Brien	New Nonpareil.
Creston News-Advertiser	W. E. Day	Creston Printing & Publishing Company.
Davenport Democrat & Leader	Leland M. Turnbull	Democrat Publishing Company.
Davenport Times	E. P. Adler	The Times Co.
Des Moines Tribune Register	Gardner Cowles, Jr.	The Register & Tribune Company.
Des Moines Tribune	W. W. Waymack	Do.
Dubuque Telegraph-Herald and Times-Journal.	{C. L. Woodward. F. W. Woodward}	The Telegraph Herald.
Estherville News	Deemer Lee	Deemer Lee.
Fort Dodge Messenger & Chronicle	W. S. Merryman	Messenger Printing Company.
Iowa City Daily Iowan	Frank Mott	Student Publications, Inc.
Iowa City Press-Citizen	Merritt C. Speidel	Press-Citizen Company, Inc.
Marshalltown Times-Republican.	D. K. Hoopes	Times Republican Printing Company.
Mason City Globe-Gazette	Lee P. Loomis	Mason City Globe-Gazette Company.
Missouri Valley Times	Willard M. S. Dale	James R. Rhodes.
Muscatine Journal & News Tribune.	Clyde R. Robedaux	Journal Printing Company.
Newton News	James R. Rhodes	News Printing Company.
Ottumwa Courier	John Huston	Courier Printing Company.
Perry Chief	F. E. Whitehead	Chief Printing Company.
Sioux City Journal	W. H. Sammons	The Journal Tribune Publishing Co.
Sioux City Tribune Journal	W. R. Perkins	Do.
Spencer Reporter	Ray L. Anderson	The Spencer Publishing Co.
Waterloo Daily Courier	{John P. Von Lackman Jackson McCoy}	The W. H. Hartman Company.
Webster City Freeman-Journal	Geo. C. Tucker	Freeman Journal Publishing Co.

KANSAS

Abilene Reflector	C. M. Harger	Reflector Printing Company.
Arkansas City Traveler	Oscar S. Stauffer	Traveler Publishing Company.
Atchison Globe	Eugene A. Howe	Globe Printing Company.

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KANSAS—continued

Newspaper	Representative	Member
Beloit Daily Call	Harry K. Houghton	Harry K. Houghton & A. B. Adamson, Jr.
Chanute Tribune	John P. Harris	The Chanute Publishing Company.
Cherryvale Republican	Pryor S. Campbell	Pryor S. Campbell
Clay Center Dispatch	Harry E. Valentine	The Clay Center Publishing Co.
Coffeyville Journal	H. J. Powell	Hugh J. Powell, Stanley Platz.
Concordia Blade-Empire	Ray Green	The Blade Empire Publishing Co.
Dodge City Globe	J. C. Denious	The Globe Publishing Company.
El Dorado Times	R. A. Clymer	The Times Publishing Company.
Emporia Gazette	W. A. White	W. A. White.
Fort Scott Tribune Monitor	Geo. W. Marble, Jr.	The Tribune-Monitor Company.
Frankfort Index	A. P. Hartman	H. H. and A. P. Hartman.
Fredonia Herald	Ben S. Hudson	Ben S. Hudson.
Garden City Telegram	Gervais F. Reed	Telegram Publishing Company.
Great Bend Tribune	M. D. Spencer	Mrs. Alice R. Townsley.
Hays Daily News	Frank Motz	News Publishing Company.
Hutchinson Herald	John P. Harris	The Hutchinson Publishing Co.
Hutchinson News	Sidney F. Harris	Do.
Independence Reporter	H. A. Meyer	The Reporter Publishing Co., Inc.
Iola Register	Charles F. Scott	Charles F. Scott.
Junction City Union	Harry E. Montgomery	John Montgomery & Son.
Lawrence Journal-World	W. C. Simons	The World Company.
Leavenworth Times	D. R. Anthony III	D. R. Anthony III.
Lyons Daily News	Paul A. Jones	Lyons Publishing Company.
McPherson Republican	W. J. Krehbiel	W. J. Krehbiel.
Manhattan Mercury	Fay N. Seaton	Fay N. Seaton.
Manhattan Morning Chronicle	do.	Do.
Neodesha Sun	Jack A. Moorhead	Jack A. Moorhead.
Newton Kansan-Republican	Mrs. J. C. Mack	The Kansan Printing Company.
Norton Daily Telegram	C. L. Jacoby	Telegram Publishing Company.
Ottawa Herald	Sydney F. Harris	Mrs. Ralph A. Harris & Sons.
Parsons Sun	Clyde M. Reed	The Sun Publishing Company.
Pittsburgh Headlight	F. W. Brinkerhoff	The Pittsburgh Publishing Company.
Pittsburgh Sun	F. H. Vandegrift	Do.
Pratt Tribune	Charles W. Pratt	The Tribune Publishing Company.
Salina Journal	Roy F. Bailey	Salina Journal, Inc.
Topeka Capital	Arthur Capper	Capper Publications, Inc.
Topeka State Journal	O. S. Stauffer	The Topeka State Journal, Inc.
Wellington News	H. L. Woods	H. L. Woods.
Wichita Beacon	M. M. Levand	Beacon Publishing Company.
Wichita Eagle	Marcellus M. Murdock.	The Victoria Murdock Estate.
Winfield Daily Courier	W. G. Anderson	W. G. Anderson.

KENTUCKY

Ashland Daily Independent	B. F. Forgey	Ashland Publishing Company.
Bowling Green Park City Daily News	C. M. Gaines	The News Publishing Company.
Corbin Times-Tribune	James O. Crawford	The Corbin Times-Tribune, Inc.
Covington Kentucky Times-Star	C. H. Rembold	The Cincinnati Times-Star Co.
Danville Kentucky Advocate	Vernon Richardson	Danville Advocate-Messenger, Inc.
Frankfort State-Journal	Mrs. Lillian W. Newman.	The State Journal Company.
Fulton Daily Leader	J. H. Moore	Baptist Flag Publishing Company.
Harlan Daily Enterprise	John L. Crawford	The Enterprise Publishing Company.

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KENTUCKY—continued

Newspaper	Representative	Member
Hazard Herald	Charles N. Wooton	The Herald Publishing Company.
Henderson Gleaner & Sunday Gleaner & Journal	Leigh Harris	Leigh Harris.
Henderson Journal	do	Do.
Hopkinsville Kentucky New Era	Thomas F. Wood	The Kentucky New Era, Inc.
Lexington Leader	Fred B. Wachs	John G. Stoll.
Lexington Herald	do	Do.
Louisville Courier-Journal	Mark Ethridge	The Louisville Courier-Journal Co.
Louisville Times	G. Barry Bingham	Louisville Times Company.
Madisonville Messenger	Woodson Browning	Madisonville Publishing Company.
Mayfield Daily Messenger	Frank O. Evens	The Mayfield Publishing Company.
Maysville Independent	James Purdon	Purdon & Schatzmann.
Owensboro Inquirer	W. B. Hager	Owensboro Publishing Co., Inc.
Owensboro Messenger	Lawrence W. Hager	Do.
Paducah Sun-Democrat	(Edwin J. Paxton W. P. Paxton)	Paducah Newspapers, Inc.
Princeton Leader	G. M. Pedley	G. M. Pedley.
Providence Enterprise	J. L. Bradley	Providence Publishing Co., Inc.
Richmond Register	Keen Johnson	The Daily Register Company.
Winchester Sun	James S. Tatman	Winchester Sun Co., Inc.

LOUISIANA

Alexandria Town-Talk	Rollo C. Jarreau	McCormick & Co., Inc.
Baton Rouge Morning Advocate	L. D. Manship	Capital City Press.
Baton Rouge State-Times	Charles P. Manship	Do.
Crowley Signal	O. E. Priestley	Signal Publishing Company.
Jennings Jeff Davis Parish News	Franklin Hildebrand	Franklin Hildebrand.
Lafayette Daily Advertiser	Thomas M. Callahan	Lafayette Advertiser Gazette, Inc.
Lake Charles American Press	Frank A. Smith	American Press Co., Inc.
Monroe Morning World	Robert Ewing, Jr.	News Star-World Publishing Co.
Monroe News-Star	Wilson Ewing	Do.
The New Orleans Item	Ralph Nicholson	The Item Company, Inc.
New Orleans States	James Evans Crown	The Times-Picayune Publishing Co.
New Orleans Times-Picayune	L. K. Nicholson	Do.
Opelousas Clarion-News	J. N. Langford	Opelousas News Co., Inc.
Shreveport Journal	Douglas Attaway	Journal Publishing Co., Inc.
Shreveport Times	John D. Ewing	Times Publishing Co., Ltd.

MAINE

Augusta Kennebec-Journal	Fred R. Lord	Gannett Publishing Co.
Bangor Commercial	James E. MacPherson	J. P. Bass Publishing Co.
Bangor News	Fred D. Jordan	Bangor Publishing Company.
Bath Times	F. B. Nichols	The Times Company.
Biddeford Journal	Julius Mathews	Journal Publishing Corp.
Lewiston Journal	Louis B. Costello	Lewiston Daily Sun, Inc.
Lewiston Sun	George W. Wood	Do.
Portland Evening Express	Guy P. Gannett	Gannett Publishing Co., Inc.
Portland Press-Herald Sunday Telegram & Press Herald	do	Do.
Waterville Sentinel	Caleb A. Lewis	Do.

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MARYLAND

Newspaper	Representative	Member
Annapolis Capital	Talbot T. Speer	The Capital Gazette Press, Inc.
Baltimore American	Mrs. W. R. Hearst	Hearst Consolidated Publications, Inc.
Baltimore News Post	W. M. Baskervill	Do.
Baltimore Evening Sun	Harry C. Black	A. S. Abell Company.
Baltimore Sun	Paul Patterson	Do.
Cambridge Banner	Arnold Daane	Arnold Daane.
Cumberland Daily News	Wm. L. Geppert	The Times & Allegian Company.
Cumberland Times	Joseph B. Finan	Do.
Frederick News	R. E. Delaplaine	Great Southern Printing & Mfg. Co.
Frederick Post	Wm. T. Delaplaine	Do.
Hagerstown Mail	Wm. P. Lane, Jr.	The Herald-Mail Company.
Hagerstown Herald	S. E. Phillips	Do.
Salisbury Times	Richard P. Curtiss	The Brush-Moore Newspapers, Inc.

MASSACHUSETTS

Athol Daily News	Edward T. Fairchild	Athol Press, Inc.
Attleboro Sun	Charles C. Cain, Jr.	Sun Publishing Company.
Boston American & Boston Sunday Advertiser	Harold G. Kern	American Newspapers, Inc.
Boston Christian Science Monitor	A. Warren Norton	The Christian Science Publishing Soc.
Boston Globe	{ W. O. Taylor	Globe Newspaper Company.
	{ Wm. Davis Taylor	Do.
Boston Herald	Robert B. Choate	Boston Herald-Traveler Corp.
Boston Post	Richard Grozier	Post Publishing Company.
Boston Record	Ernest Hoftyzer	American Newspapers, Inc.
Boston Traveler	Harold F. Wheeler	Boston Herald-Traveler Corp.
Brockton Enterprise & Times	Charles L. Fuller	Enterprise Publishing Company.
Fall River Herald-News	Edward J. Delaney	Herald-News Publishing Company.
Fitchburg Sentinel	George H. Godbeer	Sentinel Publishing Company.
Gardner News	S. W. Rogers	The Gardner News, Inc.
Greenfield Recorder-Gazette	Paul S. Walcott	Recorder Publishing Corp.
Haverhill Gazette	Wm. H. Heath	Haverhill Gazette Company.
Lawrence Eagle	Alexander H. Rogers	Hildreth-Rogers Company.
Lawrence Evening Tribune	George A. Mellen	Do.
Leominster Enterprise	Clinton P. Rowe	Leominster Enterprise Co., Inc.
Lowell Sun & Citizen Leader	Thomas F. Costello	Lowell Sun Company.
Lynn Daily Item	Charles H. Gamage	Hastings & Sons Publishing Co.
New Bedford Mercury	Lincoln G. Sowle	S. Anthony & Sons, Inc.
New Bedford Evening Standard-Times & Sunday Morning Standard-Times.	Basil Brewer	Do.
North Adams Transcript	James A. Hardman	James A. Hardman.
Northampton Daily Hampshire Gazette.	Arthur Frederick	H. S. Gere & Sons, Inc.
Norwood Messenger	Harry P. Hurwich	Norwood Messenger, Inc.
Pittsfield Berkshire Eagle	Donald B. Miller	Eagle Publishing Company.
Salem News	Harry E. Flint	Salem News Publishing Company.
Springfield Republican	Richard Hooker	The Republican Publishing Company.
Springfield Union	{ Henry B. Russell	The Springfield Union Publishing Co.
	{ Paul F. Craig	Do.
Taunton Gazette	Wm. Hale Reed	William Reed & Sons Company.

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MASSACHUSETTS—continued

Newspaper	Representative	Member
Waltham News-Tribune.....	Alexander T. Skakle..	Waltham Publishing Company.
Worcester Gazette.....	Harry G. Stoddard...	Worcester Telegram Publishing Co., Inc.
Worcester Telegram & Sunday Telegram.	Geo. F. Booth.....	Do.

MICHIGAN

Adrian Telegram.....	Stuart H. Perry.....	The Adrian Telegram.
Ann Arbor Michigan Daily.....	E. R. Sunderland.....	Board in Control of Student Publications.
Ann Arbor News.....	Arthur W. Stace.....	Booth Newspapers, Inc.
Battle Creek Enquirer & News...	A. L. Miller.....	Enquirer-News Company.
Bay City Times.....	Glenn MacDonald...	Booth Newspapers, Inc.
Benton Harbor News-Palladium.	Stanley R. Banyon...	Palladium Publishing Company.
Calumet Evening News Journal.	M. J. Trethaway.....	The Mining Gazette Company.
Detroit Free Press.....	John S. Knight.....	Knight Newspapers, Inc.
Detroit News & Sunday News...	William E. Scripps...	The Evening News Association.
Escanaba Press.....	John P. Norton.....	The Daily Press Co., Inc.
Flint Journal.....	M. A. Gorman.....	Booth Newspapers, Inc.
Grand Haven Daily Tribune.....	Almon W. McCall...	The Grand Haven Daily Tribune, Inc.
Grand Rapids Herald.....	Frank M. Sparks....	Herald Publishing Company.
Grand Rapids Press.....	Lee M. Woodruff....	Booth Newspapers, Inc.
Hillsdale News.....	H. J. Burgess.....	The Hillsdale Herald, Inc.
Houghton Mining Gazette.....	John W. Rice.....	The Mining Gazette Company.
Ionia Sentinel-Standard.....	Frederick McC. Kidd	The Ionia Sentinel-Standard, Inc.
Iron Mountain Daily News.....	Wm. F. Russell.....	Iron Mountain Publishing Com- pany.
Ironwood Globe.....	Linwood I. Noyes....	Globe Publishing Company.
Jackson Citizen-Patriot.....	Carl M. Saunders....	Booth Newspapers, Inc.
Kalamazoo Gazette.....	J. K. Walsh.....	Do.
Lansing State Journal.....	Paul A. Martin.....	The State Journal Company.
Ludington Daily News.....	Harold Furstenau...	Harold Furstenau.
Marquette Mining Journal.....	Frank J. Russell....	The Mining Journal, Inc.
Menominee Herald-Leader.....	R. M. Andrews.....	Herald-Leader Company.
Monroe News.....	J. S. Gray.....	Monroe Publishing Company.
Mount Clemens Monitor.....	Paul W. McKee.....	Monitor Publishing Company.
Muskegon Chronicle.....	Archie E. McCrear...	Booth Newspapers, Inc.
Niles Star.....	John R. Scamehorn...	The Star Publishing Company.
Owosso Argus-Press.....	J. E. Campbell.....	Argus-Press Company.
Pontiac Daily Press.....	Harold A. Fitzgerald.	Pontiac Press Company.
Port Huron Times-Herald.....	Louis A. Weil.....	Times-Herald Company.
St. Joseph Herald Press.....	Rex V. Wynkoop....	Palladium Publishing Company.
Saginaw News.....	Arthur R. Treanor...	Booth Newspapers, Inc.
Sault Ste. Marie News.....	George A. Osborn...	Sault News Printing Compan y.
Ypsilanti Daily Press.....	George C. Handy....	The Ypsilanti Press.

MINNESOTA

Albert Lea Tribune.....	L. S. Whitcomb.....	Albert Lea Publishing Company.
Austin Herald.....	H. E. Rasmussen....	Herald Publishing Company.
Bemidji Pioneer.....	H. Z. Mitchell.....	Bemidji Pioneer Publishing Co.
Crookston Times.....	D. A. McKenzie.....	Crookston Times Printing Co.
Duluth Herald.....	J. R. Van Horn.....	Northwest Publications, Inc.
Duluth News-Tribune.....	Herman H. Ridder...	Do.
Fairmont Daily Sentinel.....	James F. Cavers....	Sentinel Publishing Company.

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MINNESOTA—continued

Newspaper	Representative	Member
Faribault Daily News	Mrs. Helen L. Bratton	Faribault Daily News, Inc.
Fergus Falls Daily Journal	W. L. Robertson	Fergus Journal Company.
International Falls Daily Journal	Paul Anderson	Border Publishing Company.
Hibbing Tribune	R. W. Hitchcock	R. W. Hitchcock.
Little Falls Transcript	Ed. M. LaFond	Transcript Publishing Company.
Mankato Free Press	James A. Callahan	Free Press Company.
Marshall Daily Messenger	W. C. Peterson	The News-Messenger, Inc.
Minneapolis Star-Journal	John Cowles	Minneapolis Star Journal & Tribune Co.
Minneapolis Tribune	B. L. Walters	Do.
Minneapolis Times	G. B. Bickelhaupt	Do.
Owatonna Daily Peoples Press	Geo. F. Darby	B. E. Darby & Sons, Inc.
Red Wing Republican Eagle	Albert Marshall, Jr.	The Red Wing Publishing Company.
Redwood Falls Gazette	Scott Schoen	Redwood Gazette Publishing Co., Inc.
Rochester Post-Bulletin	G. S. Witherstine	Post Bulletin Company.
St. Cloud Times	Fred Schilplin	The Times Publishing Company.
St. Paul Dispatch	Wm. F. Johns	Northwest Publications, Inc.
St. Paul Pioneer Press	Joseph E. Ridder	Do.
Virginia Enterprise	Burt D. Pearson	Enterprise Printing & Publishing Co.
Willmar Tribune	Victor E. Lawson	Victor E. Lawson.
Winona Republican-Herald	H. R. Wiecking	Republican & Herald Publishing Co.
Worthington Globe	V. M. Vance	V. M. Vance.

MISSISSIPPI

Clarksdale Register and News	Mrs. Lillian P. Clark	Register Publishing Co., Inc.
Columbus Commercial Dispatch	Birney Imes	Commercial Dispatch Publishing Co.
Corinth Daily Corinthian	E. O. Klyce	E. O. Klyce & J. C. Bishop.
Greenville Delta Democrat-Times	Hodding Carter	Delta Democrat Publishing Co.
Greenwood Commonwealth	Sumter Gillespie	Sumter Gillespie.
Gulfport Herald	W. G. Wilkes	George W. Wilkes Sons.
Hattiesburg American	Francis S. Harmon	Hattiesburg American, Inc.
Jackson Clarion-Ledger	T. M. Hederman	The Clarion Ledger Company.
Jackson News	Frederick Sullens	News Publishing Co.
Laurel Leader Call	James H. Skewes	The Laurel Daily Leader, Inc.
McComb Enterprise	John Oliver Emmerich	John Oliver Emmerich.
Meridian Star	Grace B. Skewes	The Meridian Star Company.
Natchez Democrat	Jas. K. Lambert	Natchez Democrat Ptg. & Publishing Co., Inc.
Pascagoula Moss Point Advertiser	Mrs. F. G. Hollister	The Advertiser Publishing Company.
Tupelo Daily News	J. Fred Price	Daily News Company.
Vicksburg Herald	P. L. Barclift	Vicksburg Printing & Publishing Co.
Vicksburg Evening Post	L. P. Cashman	J. G. Cashman & Sons.
West Point Times Leader	Edgar G. Harris	Edgar G. and Buelah L. Harris.

MISSOURI

Boonville Daily News	H. R. Winsor	The Boonville Press, Inc.
Cape Girardeau Southeast Missourian	Fred Naeter	Naeter Bros. Publishing Co.
Carrollton Daily Democrat	W. R. Painter	Carrollton Democrat Printing Co.
Carthage Press	W. J. Sewall	Carthage Press Publishing Co.
Chillicothe Constitution Tribune	C. E. Watkins	Chillicothe Publishing Co.

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MISSOURI—continued

Newspaper	Representative	Member
Columbia Tribune	H. J. Waters	Tribune Publishing Company.
Fulton Daily Sun-Gazette	Geo. P. Johnston	Geo. P. Johnston.
Hannibal Courier-Post	E. L. Sparks	The Courier-Post Publishing Co.
Jefferson City Capital-News	Robert C. Goshorn	Capital News Printing Co.
Jefferson City Post-Tribune	do.	Tribune Printing Company.
Joplin Globe	Cowgill Blair	Joplin Globe Publishing Co.
Joplin News-Herald	Ray S. Cochran	Do.
Kansas City Star	Geo. B. Longan	The Kansas City Star Company.
Kansas City Times	Roy A. Roberts	Do.
Lamar Republican	G. T. Heath	G. T. Heath.
Lebanon Daily News	Fred W. May	Lebanon Publishing Co., Inc.
Macon Chronicle Herald	Frank P. Briggs	Chronicle Herald Publishing Co.
Marshall Democrat-News	R. N. Hains	Democrat-Press Printing Co.
Maryville Daily Forum	M. W. Stauffer	The Forum Publishing Co.
Mexico Daily News & Intelligencer.	Raymond G. Holman	The Intelligencer Publishing Co., Inc.
Moberly Monitor-Index & Democrat.	James Todd	Moberly Index Printing Co.
Monett Times	Menzo Hainline	Menzo Hainline.
Nevada Daily Mail & Post	J. H. Bean	Southwest Mail Printing Co.
Poplar Bluff American Republic	J. H. Wolpers	Poplar Bluff Printing Co.
Sedalia Capital	Geo. H. Scruton	Sedalia Democrat Company.
Sedalia Democrat	Geo. H. Trader	Do.
St. Joseph Gazette Sunday News Press.	Dean Palmer	The News Corporation.
St. Joseph News Press	Charles M. Palmer	Do.
St. Louis Globe-Democrat	E. Lansing Ray	St. Louis Globe Democrat Co.
St. Louis Post-Dispatch	Joseph Pulitzer	The Pulitzer Publishing Co.
Sikeston Standard	C. L. Blanton	C. L. Blanton.
Springfield Leader & Press	H. S. Jewell	Springfield Newspapers, Inc.
Springfield Daily News	George Olds	Do.
Trenton Republican-Times	Mrs. Carrie Rogers Clark.	W. B. Rogers Printing Co.

MONTANA

Billings Gazette	{ Guy Mooney	The Gazette Printing Co.
	{ Fred W. Pierce	Do.
Bozeman Chronicle	Frank M. Grant	Chronicle Publishing Co.
Butte Montana Standard	E. G. Leipheimer	Standard Publishing Co.
Butte Post	J. H. Dickey, Jr.	Post Publishing Co.
Great Falls Leader	F. M. Tenney	The Leader Co., Inc.
Great Falls Tribune	O. S. Warden	The Tribune Co., Inc.
Helena Independent	Law Riskin	Independent Publishing Co. of Helena.
Helena Montana Record-Herald	Taylor B. Weir	Montana Record Herald.
Kalispell Inter Lake	L. D. Spafford	The Inter Lake Printing Co.
Lewistown Democrat-News	Tom Stout	The Democrat-News Co., Inc.
Lewistown Evening Telegram	Harry E. Lay	Do.
Livingston Enterprise	R. E. Miller	Livingston Publishing Co.
Miles City Star	W. F. Flinn	Star Printing Co.
Missoula Missoulian	French T. Ferguson	The Missoulian Publishing Co.
Missoula Sentinel	C. A. Colby	Do.

NEBRASKA

Alliance Times Herald	Ben J. Sallows	Ben Sallows.
Beatrice Sun	E. M. Marvin	E. M. Marvin.

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NEBRASKA—continued

Newspaper	Representative	Member
Fremont Morning Guide.....	Alfred G. Hill.....	Chappell-Owen (Guide) Printing Co.
Grand Island Independent.....	Arch W. Jarrell.....	Grand Island Independent Publishing Co.
Hastings Tribune.....	Fred A. Seaton.....	Fay N., Fred. A., & Richard M. Seaton.
Lincoln Star.....	Frank D. Throop.....	The Star Printing Co.
Lincoln Nebraska State Journal.....	Joe W. Seacrest.....	State Journal Printing Co.
Lincoln Evening Journal.....	Fred Seacrest.....	Do.
Norfolk News.....	Gene Huse.....	The Huse Publishing Co.
North Platte Telegraph.....	A. P. Kelly.....	Kelly & Son.
Omaha World-Herald.....	{ George Grimes..... Henry Doorly..... }	World Publishing Co.
Scottsbluff Star-Herald.....	H. J. Wisner.....	The Star-Herald Printing Co.

NEVADA

Reno Evening Gazette.....	Graham M. Dean....	Reno Newspapers, Inc.
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NEW HAMPSHIRE

Claremont Daily Eagle.....	Lincoln O'Brien.....	Claremont Eagle, Inc.
Concord Monitor & Patriot.....	James M. Langley....	Monitor Patriot Co.
Dover Foster's Democrat.....	Frederick Foster.....	Geo. J. Foster & Co.
Hanover Dartmouth.....	Michael Di Sherbiuin.	The Dartmouth, Inc.
Keene Sentinel.....	John W. Prentiss.....	Sentinel Printing Co.
Laconia Evening Citizen.....	Edward J. Gallagher.	Citizen Publishing Co.
Manchester Leader.....	Edmund F. Jewell....	The Union-Leader Publishing Co.
Manchester Union.....	C. Dekker.....	Do.
Nashua Telegraph.....	Burt E. Warren.....	Telegraph Publishing Co.
Portsmouth Herald.....	J. D. Hartford.....	Chronicle & Gazette Publishing Co.

NEW JERSEY

Asbury Park Press.....	J. L. Kinmonth.....	J. L. Kinmonth.
Atlantic City Press.....	Albert J. Feyl.....	Press-Union Publishing Co.
Atlantic City Union.....	Francis E. Croasdale.	Do.
Bridgeton News.....	Graham L. Schofield.	Evening News Co.
Elizabeth Journal.....	Fred L. Crane.....	Elizabeth Daily Journal, Inc.
Flemington Hunterdon County Democrat.	D. H. Moreau.....	Moreau and Moreau.
Freehold Transcript.....	Adrian E. Moreau....	Adrian E. Moreau.
Hackensack Bergen Evening Record.	John Borg.....	Bergen Evening Record Corp.
Jersey City Jersey Journal.....	Joseph A. Dear.....	The Evening Journal Association.
Lakewood Daily Times.....	Harry E. Newman....	The Times & Journal Publishing Co.
Long Branch Record.....	E. D. DeWitt.....	Monmouth County Publishing Co.
Millville Republican.....	Carl H. Johnson.....	Millville Publishing Co.
Morristown Daily Record.....	Norman B. Tomlinson.	Norman B. Tomlinson.
Newark Sunday Call.....	Edward F. Bataille..	Newark Call Printing & Publishing Co.
Newark Star-Ledger.....	S. I. Newhouse.....	Newark Morning Ledger Company.
Newark News.....	Edward W. Scudder..	Evening News Publishing Co.
New Brunswick Daily Home News & Sunday Times.	Elmer B. Boyd.....	Home News Publishing Co.
Passaic Herald-News.....	Dow H. Drukker, Jr.	Passaic Daily News, Inc.
Paterson Morning Call.....	Robert Williams, Jr..	Call Printing & Publishing Company.

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NEW JERSEY—continued

Newspaper	Representative	Member
Paterson Evening News	H. B. Haines	News Printing Co.
Perth Amboy News	John W. Barnhart	Perth Amboy Evening News Co.
Plainfield Courier-News	Chauncey F. Stout	Plainfield Courier-News Co.
Red Bank Register	Thomas Irving Brown	Red Bank Register, Inc.
Salem Standard & Jerseyman	Wm. H. Chew	Standard & Jerseyman Co.
Trenton State Gazette and Sunday Times Advertiser	James Kerney, Jr.	Trenton Times, Inc.
Trenton Evening Times	John E. Kerney	Do.
Toms River Ocean County Sun	W. S. Mathis	Sun Publishing Co.
Union City Hudson Dispatch	William Rubel	Hudson Dispatch.
Vineland Times Journal	Max Leuchter	Max Leuchter & Abraham M. Bass.
Wildwood Leader	Albert S. Bailie	Cape May County Leader Co., Inc.

NEW MEXICO

Albuquerque Tribune	T. M. Pepperday	Albuquerque Publishing Co.
Albuquerque Journal	H. P. Pickrell	Journal Publishing Co.
Carlsbad Current-Argus	Floyd B. Rigdon	Floyd B. Rigdon.
Clovis Evening News Journal	R. C. Hoiles	R. C. & C. H. Hoiles.
Gallup Independent	Andrew W. Barnes	Gallup Independent Newspaper, Inc.
Hobbs Daily News-Sun	E. J. Kurre	Sun Publishing Corp.
Las Cruces Sun-News	Wallace Perry	The Las Cruces Sun Publishing Co.
Las Vegas Optic	H. W. Kane	Optic Publishing Co.
Raton Range	Harold A. Hill	Harold A. Hill & Frank Pfeiffer.
Roswell Morning Dispatch	Paul McEvoy	Roswell Morning Dispatch, Inc.
Roswell Daily Record	E. J. Kurre	Record Publishing Co., Inc.
Santa Fe New Mexican	Frank C. Rand, Jr.	New Mexican Publishing Co.
Silver City Daily Press & Independent	Clyde Earl Ely	Clyde Earl Ely.
Tucumcari Daily News	V. Earl Grau	Richard Hindley & V. Earl Grau.

NEW YORK

Albany Knickerbocker News	A. J. McDonald	The Press Co., Inc.
Albany Times-Union	Fred I. Archibald	Albany Evening Union Company.
Amsterdam Recorder & Democrat	Gardiner Kline	Wm. J. Kline & Son, Inc.
Auburn Citizen-Advertiser	Charles D. Osborne	Auburn Publishing Co.
Batavia News	Milton R. Miller	Griswold and McWain, Inc.
Binghamton Press	Mrs. Willis Sharpe Kilmer.	The Binghamton Press Co.
Binghamton Sun	William H. Hill	The Morning Sun, Inc.
Buffalo Courier-Express	W. J. Conners, Jr.	Buffalo Courier-Express, Inc.
Buffalo News	E. H. Butler	Edward H. Butler & Edward H. Butler as Trustee for Ada Butler Mitchell.
Canandaigua Daily Messenger	Leon J. McCarthy	Canandaigua Messenger, Inc.
Corning Leader	W. A. Underhill	W. A. and E. S. Underhill, Jr.
Cortland Standard	Edward H. Clark	Cortland Standard Printing Co., Inc.
Elmira Advertiser & Sunday Telegram	Lynn N. Bitner	Elmira Star-Gazette, Inc.
Elmira Star-Gazette	Frank E. Tripp	Do.
Freeport Nassau Daily Review-Star	James E. Stiles	Daily Review Corp.
Geneva Daily Times	W. A. Gracey	Geneva Printing Co.

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NEW YORK—continued

Newspaper	Representative	Member
Glens Falls Post Star.....	J. Edward Singleton..	Glens Falls Post Co.
Glens Falls Times.....	Arthur P. Irving.....	Do.
Gloversville Herald.....	Edward H. Mills.....	The Wm. B. Collins Co.
Gloversville Leader-Republican.....	F. L. Rogers.....	Do.
Hornell Tribune.....	S. Mable Wombough..	W. H. Greenhow Co.
Hudson Evening Register.....	Raymond D. Kennedy..	Record Printing & Publishing Co.
Ithaca Cornell Daily Sun.....	Morris G. Bishop.....	Cornell Daily Sun, Inc.
Ithaca Journal.....	Harry G. Stutz.....	Ithaca Journal-News, Inc.
Jamestown Post-Journal.....	{John A. Hall.....}	Jamestown Newspaper Corp.
	{Alfred G. Hill.....}	
Kingston Daily Freeman.....	Mrs. Lucia de L. Klock.	Freeman Publishing Co.
Little Falls Times.....	Charles D. Crowley..	The Crowley Publishing Corp.
Lockport Union-Sun & Journal..	Egbert D. Corson...	Lockport Union-Sun & Journal, Inc.
Malone Telegram.....	Douglas N. Callander.	Malone Telegram, Inc.
Mamaroneck Daily Times.....	George P. Forbes.....	Westchester County Publishers, Inc.
Mount Vernon Daily Argus.....	A. C. Saunders.....	Do.
New Rochelle Standard Star.....	Elmer H. Miller.....	Do.
New York Journal American.....	W. R. Hearst, Jr....	Hearst Consolidated Publications.
New York Daily Mirror.....	Charles B. McCabe..	Daily Mirror, Inc.
New York Herald Tribune.....	Ogden Reid.....	New York Tribune, Inc.
New York Daily News.....	J. M. Patterson.....	News Syndicate Co., Inc.
New York Post.....	George Backer.....	New York Post, Inc.
New York Staats Zeitung.....	Victor F. Ridder.....	New York Staats Zeitung, Inc.
New York Sun.....	Wm. T. Dewart.....	New York Sun, Inc.
New York Times.....	Arthur Hays Sulzberger.	The New York Times Co.
Niagara Falls Gazette.....	Alanson C. Deuel....	The Niagara Falls Gazette Publishing Co.
Norwich Sun.....	P. L. Clark.....	The Norwich Publishing Co., Inc.
Ogdensburg Journal.....	Franklin R. Little....	Ogdensburg Publishing Co., Inc.
Oneonta Star.....	Francis A. Lee.....	Otsego Publishing Co.
Ossining Citizen-Register.....	Joseph L. Naar.....	Westchester County Publishers, Inc.
Oswego Palladium-Times.....	Edwin M. Waterbury..	Palladium-Times, Inc.
Peekskill Evening Star.....	E. Joe Albertson.....	The Peekskill Star Corp.
Plattsburg Press.....	Mrs. M. M. Dunphy..	Sentinel Publishing Co.
Port Chester Daily Item.....	Edward Hughes.....	Westchester County Publishers, Inc.
Port Jervis Union Gazette.....	Fred D. Salmon.....	Tri-States Publishing Co., Inc.
Poughkeepsie Eagle-News.....	Richard E. Coon, Jr..	Platt and Platt, Inc.
Poughkeepsie, New Yorker.....	Ed. A. Chappell.....	Poughkeepsie Newspapers, Inc.
Rochester Democrat & Chronicle.	Neal Murphy.....	Gannett Co., Inc.
Rochester Times-Union.....	Frank E. Gannett....	Do.
Rome Sentinel.....	F. Everiss Kessinger..	Rome Sentinel Co., Inc.
Salamanca Republican-Press.....	Matthew Weber.....	B. B. and Matthew Weber.
Saranac Lake Adirondack Enterprise.	John S. Ridenour....	The Adirondack Enterprise.
Saratoga Springs Saratogian.....	W. Howard Moody...	The Saratogian, Inc.
Schenectady Gazette.....	A. N. Liecny.....	Daily Gazette Co.
Schenectady Union Star.....	Paul L. Gross.....	Schenectady Union Publishing Co.
Syracuse Herald-Journal & Herald-American.	E. A. O'Hara.....	The Herald Co.
Syracuse Post-Standard.....	Ernest L. Owen.....	The Post Standard Co.

NEW YORK—continued

Newspaper	Representative	Member
Tarrytown Daily News	Wallace Odell	Westchester County Publishers, Inc.
Troy Morning Record	Dwight Marvin	The Troy Record Co.
Troy Times-Record	David B. Plum	Do.
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Utica Observer Dispatch	J. David Hogue	Observer Dispatch, Inc.
	Wm. J. Woods	Do.
Utica Daily Press	Paul B. Williams	Do.
Watertown Times	Harold B. Johnson	The Brockway Co.
Wellsville Reporter	E. Willard Barnes	The Reporter Co.
White Plains Reporter Dispatch	Ben Carroll	Westchester County Publishers, Inc.
Yonkers Herald-Statesman	J. Noel Macy	Do.

NORTH CAROLINA

Asheville Citizen & Sunday Citizen-Times	Charles A. Webb	Asheville Citizen-Times Co.
Asheville Times	D. S. Elias	Do.
Burlington Times News	R. B. Terry	The Times-News Publishing Co.
Charlotte News	W. Carey Dowd, Jr.	News Publishing Co., Inc.
Charlotte Observer	Curtis B. Johnson	The Observer Co.
Concord Tribune	W. M. Sherrill	The Concord Tribune, Inc.
Durham Morning Herald	Steed Rollins	Durham Herald, Inc.
Durham Sun	C. C. Council	Do.
Elizabeth City Advance	Herbert Peele	Herbert Peele.
Fayetteville Observer	Charles R. Wilson	Fayetteville Publishing Co.
Gastonia Gazette	James W. Atkins	Gazette Publishing Co., Inc.
Goldsboro News-Argus	Talbot Patrick	Goldsboro Publishing Co., Inc.
Greensboro News	E. B. Jeffress	Greensboro News Co.
Greensboro Record	Carl O. Jeffress	Do.
Greenville Reflector	David J. Whichard, Jr.	David J. Whichard, Jr.
Henderson Dispatch	H. A. Dennis	Henderson Dispatch Co., Inc.
Hickory Daily Record	L. C. Gifford	Hickory Record, Inc.
High Point Enterprise	R. B. Terry	High Point Enterprise, Inc.
Kannapolis Independent	James L. Moore	James L. Moore.
Lumberton Robesonian	J. A. Sharpe	The Robesonian, Inc.
Morehead City Twin City Times	H. B. Utley	H. B. Utley.
New Bern Sun-Journal	T. M. Diggs	Sun-Journal, Inc.
Pinehurst Outlook	Robert E. Harlow	Pinehurst Printing Co.
Raleigh News & Observer	Josephus Daniels	The News & Observer Publishing Co.
Raleigh Daily Times	John A. Park	The Times Publishing Co.
Rocky Mount Telegram	Josh L. Horne	Rocky Mount Publishing Co., Inc.
Salisbury Post	James F. Hurley, Jr.	The Post Publishing Co.
Shelby Star	Lee B. Weathers	Lee B. Weathers.
Statesville Daily	Pegram A. Bryant	Pegram A. Bryant.
Tarboro Southerner	V. Herman Creech	Bourne & Creech.
Washington News	Chas. McK. Thompson.	Daily News, Inc.
Wilmington News	J. Walter Webb	R. B. Page.
Wilmington Star	Rinaldo B. Page	Do.
Wilson Times	John D. Gold	P. D. Gold Publishing Co.
Winston-Salem Journal	Gordon Gray	Winston-Salem Journal Co.
Winston-Salem Twin City Sentinel	Wm. K. Hoyt	Winston-Salem Sentinel, Inc.

NORTH DAKOTA

Bismarck Tribune	Archie O. Johnson	Bismarck Tribune Co.
Devils Lake Daily Journal	M. H. Graham	Journal Publishing Co.
Fargo Forum & Daily Republican	Mrs. Jenny C. Black	Forum Publishing Co.
Fargo Forum & Daily Tribune	Norman D. Black	Do.

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NORTH DAKOTA—continued

Newspaper	Representative	Member
Grand Forks Herald	M. M. Oppegard	Grand Forks Herald, Inc.
Grand Forks Herald	Bernard J. Ridder	Do.
Jamestown Sun	Percy M. Hansen	Hansen Brothers.
Mandan Pioneer	E. A. Tostevin	Pioneer Publishing Co.
Minot News	H. S. Davies	The Minot Daily News.
Valley City Times-Record	Mrs. P. R. Trubshaw	Mrs. P. R. Trubshaw.
Williston Herald	Henry E. Polk	The Williston Herald Co.

OHIO

Akron Beacon Journal	John S. Knight	The Beacon-Journal Publishing Co.
Alliance Review	Alice C. Hoiles	Review Publishing Co.
Athens Messenger	G. K. Bush	The Messenger Publishing Co.
Canton Repository	Louis H. Brush	The Repository Printing Co.
Chillicothe Chillicothe Scioto Gazette.	J. K. Hunter	Chillicothe Newspapers, Inc.
Cincinnati Enquirer	Corcoran Thom	Ed. McLean & American Security & Trust Co., Trustees under last will and testament of John R. McLean.
Cincinnati Times-Star	Hulbert Taft	Cincinnati Times-Star Co.
Cleveland News	D. R. Hanna, Jr.	The Cleveland Co.
Cleveland Plain Dealer	Paul Bellamy	Do.
Columbus Ohio State Journal	Edgar T. Wolfe	The Ohio State Journal Co.
Columbus Evening Dispatch & Sunday Dispatch.	Harry P. Wolfe	The Dispatch Publishing Co.
Columbus Sunday Star	Howard A. White	The Star Co.
Dayton Journal & Dayton Sunday Journal-Herald.	Lewis B. Rock	The Journal-Herald Publishing Co.
Dayton Daily News	James M. Cox	The Evening News Publishing Co.
East Liverpool Review	Wm. H. Vodrey	The East Liverpool Publishing Co.
Findlay Republican-Courier	R. L. Heminger	Findlay Publishing Co.
Gallipolis Daily Tribune	H. W. Wetherholt	H. W. Wetherholt.
Hamilton Journal-News	Homer Gard	The Journal Publishing Co.
Ironton Evening Tribune & Sunday Tribune.	Miss Felonise B. Moore	The Tribune Publishing Co.
Lancaster Eagle-Gazette	R. Kenneth Kerr	The Eagle-Gazette Co.
Lima News	L. S. Galvin	The Lima News Publishing Co.
Logan Daily News	Mary Ellen Galvin	The Wayne Newspaper Co.
Lorain Journal & Times-Herald	S. A. Horvitz	The Lorain Journal Co.
Mansfield News-Journal	do	Mansfield Journal Co.
Marion Star	Joseph Vodrey	The Harding Publishing Co.
Massillon Independent	Walter H. Annenberg	Triangle Publications, Inc.
Middletown Journal	J. A. Chew	News-Journal Publishing Co.
Mount Vernon News	G. T. Culbertson	The Republican Publishing Co.
Newark Advocate & American Tribune.	C. H. Spencer	The Advocate Printing Co.
Portsmouth Times	John D. Raridan	The Times Publishing Co.
Salem News	Ralph W. Hawley	The Salem Publishing Co.
Sandusky Register-Star-News	Dudley M. White	Sandusky Newspapers, Inc.
Springfield News	James M. Cox, Jr.	Springfield Newspapers, Inc.
Springfield Daily Sun	Edgar Morris	Do.
Stuebenville Herald-Star	Roy D. Moore	The Herald Printing Co.
Toledo Blade	Grove Patterson	The Toledo Blade Co.
Toledo Times	John D. Dun	The Toledo Times Publishing Co.
Upper Sandusky Chief-Union	C. H. Lewis	Wyandot Union Publishing Co.

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OHIO—continued

Newspaper	Representative	Member
Van Wert Times Bulletin	Wayne W. Galvin	The Van Wert Publishing Co.
Warren Daily Tribune & Warren Chronicle	Mrs. Helen Hart Hurlbert	The Tribune Co.
Washington C. H. Record Herald	Wayne W. Galvin	The Washington News Publishing Co.
Wilmington News Journal	W. J. Galvin	The News-Journal Co.
Youngstown Vindicator	W. F. Maag, Jr.	The Vindicator Printing Co.
Zanesville Times-Record & Sunday Times-Signal	Clay Littick	The Zanesville Publishing Co.

OKLAHOMA

Ada News	{W. D. Little Byron Norrell}	News Publishing & Printing Co.
Ardmore Daily Ardmoreite	John F. Easley	The Ardmore Publishing Co., Inc.
Bartlesville Enterprise	Newell G. Welty	The Examiner Co.
Bartlesville Examiner	N. D. Welty	Do.
Bristow Daily Record	L. M. Nichols	Bristow Record Co.
Chickasha Daily Express	Geo. H. Evans	Geo. H. Evans.
El Reno Daily Tribune	Ray J. Dyer	El Reno Printing & Publishing Co.
Enid Daily Eagle	Wm. M. Taylor	The Enid Publishing Co.
Enid Morning News	Milton C. Garber	Do.
Guthrie Daily Leader	Raymond Fields	Leader Publishing Co.
Lawton Morning Press	Mrs. Homer Hedges	Mrs. Homer Hedges.
McAlester News-Capital	Fred G. Cowles	News-Capital Co.
Miami News-Record	C. M. Bartlett	News-Record Publishing Co., Inc.
Muskogee Daily Phoenix	Tams Bixby, Jr.	Oklahoma Press Publishing Co.
Muskogee Times Democrat	Tams Bixby III	Do.
Norman Oklahoma Daily	C. H. Brite	Publication Board of the Student Association of University of Oklahoma.
Nowata Daily Star	Ralph E. Staffelbach	Ralph E. Staffelbach.
Oklahoma City Oklahoman	E. K. Gaylord	The Oklahoma Publishing Co.
Oklahoma City Times	Edgar T. Bell	Do.
Oklmulgee Times & Sunday Times Democrat	Donald W. Reynolds	Times Publishing Co.
Pauls Valley Democrat	Jesse Alexander	Jesse Alexander.
Ponca City News	Clyde E. Muchmore	The Ponca City Publishing Co., Inc.
Seminole Producer & Reporter	James T. Jackson	Seminole Newspapers, Inc.
Shawnee Morning News	W. G. Dunn	Shawnee News Co., Inc.
Shawnee Evening Star	Tom Steed	Do.
Tulsa Tribune	Richard Lloyd Jones	The Tulsa Tribune Co.
Tulsa World	N. G. Henthorne	World Publishing Co.
Stillwater News Press	C. R. Bellatte	

OREGON

Baker Democrat Herald	Lucien P. Arant	Baker Democrat-Herald, Inc.
Corvallis Daily Gazette-Times	Claude E. Ingalls	The Corvallis Gazette-Times, Inc.
Eugene Register-Guard	{Alton F. Baker Wm. M. Tugman}	Guard Publishing Co.
Grants Pass Daily Courier	A. E. Voorhies	A. E. Voorhies.
Klamath Falls Evening Herald	Frank Jenkins	The Herald Publishing Co.
Klamath Falls Daily News	do	The News Publishing Co.
Medford Mail Tribune	Robert W. Ruhl	Medford Printing Co.
Pendleton East Oregonian	Edwin B. Aldrich	East Oregon Publishing Co.
Portland Morning Oregonian & Sunday Oregonian	Palmer Hoyt	Oregonian Publishing Co.

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OREGON—continued

Newspaper	Representative	Member
Roseburg News-Review	Harris Ellsworth	News-Review Co., Inc.
Salem Capital-Journal	George Putnam	George Putnam.
Salem Oregon Statesman	Charles A. Sprague	Statesman Publishing Co., Inc.
The Dalles Chronicle	Ben R. Litfin	Ben R. Litfin.

PENNSYLVANIA

Allentown Morning Call & Sunday Call-Chronicle	David A. Miller	Allentown Call Publishing Co.
Allentown Evening Chronicle	Royal W. Weiler	The Chronicle & News Publishing Co.
Altoona Tribune	Henry W. Shoemaker	The Times-Tribune Co.
Bangor Daily News	John L. Murray	The Evening Post Co.
Beaver Falls News-Tribune	James H. March	Tribune Printing Co.
Bethlehem Globe-Times	Harold B. Farquehar	The Bethlehem Globe Printing Co.
Bloomsburg Morning Press	Paul R. Eyerly	Vanderslice & Eyerly.
Bradford Era	Robert P. Habgood	Era Publishing Co.
Carbondale Leader	Geo. J. Turner	The Pioneer Press, Inc.
Chambersburg Public Opinion	Herbert S. Foltz	The Public Opinion Co.
Clearfield Progress	G. Albert Stewart	Progressive Publishing Co.
Coatesville Record	C. H. Heintzelman	C. H. Heintzelman.
Corry Evening Journal	Arthur Colegrove	Mrs. A. D. & Arthur Colegrove.
Donora Herald American	Grover W. Boyd	Herald-American, Inc.
Easton Express	J. L. Stackhouse	Easton Publishing Co.
Easton Free Press	Rolland W. Adams	Plain Dealer Publishing Co., Inc.
Ellwood City Ledger	Will C. Kegal	Citizens Publishing & Printing Co.
Erie Dispatch-Herald	R. J. Virtue	Record Publishing Co. of Erie.
Gettysburg Times	Robert B. McClean	Times & News Publishing Co.
Greensburg Morning Review	E. Arthur Sweeny	Tribune-Review Publishing Co.
Greenville Record-Argus	John L. Morrison	John L. Morrison.
Hanover Sun	Hugh B. Hostetter	Evening Sun Co. (Evening).
Harrisburg Telegraph	Albert H. Stackpole	The Telegraph Printing Co.
Harrisburg Patriot	Vance C. McCormick	The Patriot Co.
Hazleton Plain Speaker	Frank Walser	J. R. Dershuck & Henry Walser.
Hazleton Standard Sentinel	Henry Walser	Do.
Indiana Evening Gazette	N. Dewitt Ray	Indiana Printing & Publishing Co.
Johnstown Democrat	John C. Sheridan	Johnstown Democrat Co., Inc.
Johnstown Tribune	Walter W. Krebs	The Johnstown Tribune Printing Co.
Lancaster New Era	John F. Steinman	New Era Co.
Lancaster Intelligencer-Journal & Sunday News	J. H. Steinman	Steinman & Steinman.
Lansford Evening Record	John R. Watkins	John R., Wm. W., David G., Jr., and Cilla D. Watkins.
Lebanon Daily News-Times	Henry L. Wilder	Lebanon News Publishing Co.
Lehighon Leader	Guy V. Morthimer	Guy V. Morthimer.
Lock Haven Express	Frank D. O'Reilly	Lock Haven Express Printing Co.
Kane Republican	G. Scott Smith	The Kane Republican Co.
Mauch Chunk Times-News	James J. Boyle	James J. Boyle.
Meadville Evening Republican	Edward Irving Bates	The Tribune Publishing Co.
Meadville Tribune-Republican	Robert S. Bates	Do.
Montrose Independent	Braton R. Gardner	Montrose Publishing Co.
Oil City Blizzard	John O'Donnell	The Derrick Publishing Co.
Oil City Derrick	Edward P. Boyle	Do.
Philadelphia Evening Bulletin	Robert McLean	Bulletin Co.
Philadelphia Gazette-Democrat	Louis Mayer	Philadelphia Gazette Publishing Co.
Philadelphia Inquirer	M. L. Annenberg	Philadelphia Inquirer Co.

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PENNSYLVANIA—continued

Newspaper	Representative	Member
Philadelphia Evening Public Ledger.	Robt. Cresswell	Public Ledger, Inc.
Philadelphia Record	J. David Stern	Philadelphia Record Co.
Phoenixville Republican	E. J. Breece	Phoenixville Publishing Co.
Pittsburgh Post-Gazette	O. J. Keller	P. G. Publishing Co.
Pittsburgh Sun-Telegraph	H. M. Bitner	Pittsburgh Publishing Co.
Pottstown Mercury and News	Wm. M. Hiester	The Pottstown Daily News Publishing Co.
Pottsville Republican	J. H. Zerbey, Jr.	J. H. Zerbey Newspapers, Inc.
Reading Eagle	Hawley Quier	Reading Eagle Co.
Reading Times	James E. Keller	Do.
Sayre Evening Times	A. R. Michener	The Sayre Printing Co.
St. Marys Daily Press	W. G. Bauer	Daily Press Publishing Co.
Scranton Tribune	M. L. Goodman	Scranton Republican Publishing Co.
Scranton Times	E. J. Lynott	E. J. Lynott.
Somerset Daily American	Henry Baker Reiley	Somerset Newspapers, Inc.
Stroudsburg Record	N. A. Frantz	Monroe Publishing Co., Inc.
Sunbury Daily Item	Lewis Dewart	Daily Publishing Co.
Titusville Herald	E. T. Stevenson	The Titusville Herald, Inc.
Towanda Daily Review	David M. Turner	The Towanda Printing Co.
Uniontown Herald	C. D. Harader	Uniontown Newspapers, Inc.
Warren Times-Mirror	W. A. Walker	Times Publishing Co.
Washington Observer	Mrs. J. L. Stewart	Observer Publishing Co.
Waynesboro Record Herald	Floyd Chalfant	The Record-Herald Publishing Co., Inc.
Waynesburg Democrat-Messenger.	J. T. Robinson	The Democrat Publishing Co.
Wilkes-Barre Record	L. J. Van Laeys	The Wilkes-Barre Publishing Co.
Wilkes-Barre Times Leader	Ernest G. Smith	Do.
Williamsport Gazette & Bulletin	E. W. Case	The Sun Gazette Company.
Williamsport Grit	George R. Lamade	Grit Publishing Co.
Williamsport Sun	John E. Person	The Sun Gazette Co.
York Dispatch	H. W. Young	Dispatch Publishing Co.
York Gazette & Daily	J. W. Gitt	York Gazette Co.

RHODE ISLAND

Newport Herald	W. D. Hazard	Newport Herald Corp.
Newport Daily News	George Burdick	The Edward A. Sherman Publishing Co.
Pawtucket Times	Stanley T. Black	Times Publishing Co.
Providence Bulletin	Stephen O. Metcalf	Providence Journal Co.
Providence Journal	Geo. Pierce Metcalf	Do.
Westerly Daily Sun	George B. Utter	The Utter Co.
Woonsocket Evening Call	Buell W. Hudson	The Evening Call Publishing Co.

SOUTH CAROLINA

Anderson Mail	B. Palmer	Independent Publishing Co.
Anderson Independent	Wilton E. Hall	Do.
Charleston News & Courier	Robert E. Manigault	The News & Courier Co.
Charleston Evening Post	Fay O. Emerson	Evening Post Publishing Co.
Columbia Record	G. A. Buchanan, Jr.	Record Publishing Co.
Columbia State	William Elliott	The State Co.
Florence Morning News	J. M. O'Dowd	Florence Printing Co.
Greenville Daily News	Roger C. Peace	The Greenville News-Piedmont Co.
Greenville Daily Piedmont	Judson W. Chapman	Do.

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SOUTH CAROLINA—continued

Newspaper	Representative	Member
Greenwood Index-Journal	Harry L. Watson	The Index Journal Co.
Orangeburg Times & Democrat	James Izlar Sims	Sims Publishing Co.
Rock Hill Herald	A. W. Huckle	Herald Publishing Co.
Spartanburg Herald	James F. Crook	Spartanburg Herald-Journal Co.
Spartanburg Journal	S. S. Wallace, Jr.	Do.
Sumter Daily Item	H. G. Osteen	Osteen Publishing Co., Inc.
Union Times	Lewis M. Rice	The Union Times Co.

SOUTH DAKOTA

Aberdeen American News	{Eric Ridder Henry J. Schmitt}	Aberdeen News Co.
Deadwood Daily Pioneer Times	Leland V. Morford	Morford Brothers.
Hot Springs Star	C. J. Twomey	Star Publishing Co.
Huron Evening Huronite	Robert D. Lusk	Huron Publishing Co.
Lead Call	John A. Stanley	The Call Publishing Co.
Madison Daily Leader	J. F. Stahl	J. F. & Margaret E. Stahl.
Mitchell Daily Republic	W. R. Ronald	The Mitchell Publishing Co.
Pierre Capital Journal	Robert B. Hipple	Hipple Printing Co.
Rapid City Daily Journal	R. W. Hitchcock	Journal Publishing Co.
Sioux Falls Daily Argus Leader	C. M. Day	The Argus-Leader Co.
Watertown Public Opinion	S. X. Way	Watertown Public Opinion Co.
Yankton Press & Dakotan	Fred H. Monfore	Yankton Printing Co.

TENNESSEE

Chattanooga News-Free Press	Roy McDonald	Chattanooga News-Free Press Co.
Chattanooga Times	{Julius Ochs Adler Arthur Shelby Ochs}	Times Printing Co.
Clarksville Daily Leaf Chronicle	M. Stratton Foster	Leaf Chronicle Co., Inc.
Dyersburg State Gazette	Harvey A. Nelson	State Gazette Publishing Co.
Elizabethton Star	M. S. Bangs	Elizabeth Star, Inc.
Greeneville Democrat Sun	Mrs. E. O. Susong	E. O. Susong, W. Hand, W. M. O'Keefe.
Jackson Sun	C. E. Pigford	Sun Publishing Co.
Johnson City Chronicle	Carl A. Jones, Jr.	Press, Inc.
Johnson City Press	Carl A. Jones	Do.
Kingsport Times	J. W. West	Kingsport Publishing Co., Inc.
Knoxville Journal	Roy N. Lotspeich	Knoxville Publishing Co.
Memphis Commercial Appeal	John H. Sorrells	Memphis Commercial Appeal Co.
Morristown Daily Gazette & Mail	John E. Helms, Jr.	John E. Helms, Jr.
Murfreesboro Daily News Journal	Jack McFarland	Mid-South Publishing Co., Inc.
Nashville Banner	James G. Stahlman	Nashville Banner Publishing Co.
Nashville Tennessean	Silliman Evans	The Tennessean Newspapers, Inc.
Paris Post-Intelligencer	W. P. Williams	W. P. Williams.
Union City Daily Messenger	Ed. S. Critchlow	Ed. S. Critchlow.

TEXAS

Abilene Daily Reporter-News	Wendell Bedichek	Reporter Publishing Co.
Abilene Reporter News	M. B. Hanks	Do.
Amarillo Globe	Gene A. Howe	Globe News Publishing Co., Inc.
Amarillo News	John L. McCarty	Do.
Athens Daily Review	A. M. Barnes	Athens Daily Review.
Austin American	Charles E. Marsh	American Publishing Co.

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TEXAS—continued

Newspaper	Representative	Member
Austin Statesman.....	Louis N. Goldberg.....	American Publishing Co.
Beaumont Enterprise.....	Alfred Jones.....	The Enterprise Co.
Beaumont Journal.....	E. C. Davis.....	Do.
Big Spring Herald.....	R. W. Whipsky.....	Big Spring Herald, Inc.
Borger Herald.....	David M. Warren.....	Pan-Handle Publishing Co., Inc.
Brownsville Herald.....	J. M. Stein.....	Brownsville Herald Publishing Co.
Bryan Eagle.....	Mrs. Lee J. Rountree.....	Eagle Printing Co.
Clarksville Times.....	S. B. Fryar.....	The Clarksville Times Co.
Corpus Christi Caller & Caller Times.....	Roy Miller.....	Caller-Times Publishing Co.
Corpus Christi Times.....	Geo. R. Kunkel.....	Do.
Corsicana Sun.....	Lynne A. Wortham.....	Sun Light Publishing Co.
Dallas News.....	George B. Dealey.....	A. H. Belo Corporation.
Dallas Daily Times-Herald.....	Tom C. Gooch.....	The Times-Herald Printing Co.
Del Rio News-Herald.....	Louis F. Leurig.....	The Del Rio Publishing Co., Inc.
Denison Herald.....	Millard Cope.....	Denison Herald, Inc.
Denton Record & Chronicle.....	R. J. Edwards.....	Record & Chronicle Co.
Edinburg Daily Review.....	W. R. Montgomery.....	Review Printing Co.
El Paso Times.....	D. D. Roderick.....	El Paso Times, Inc.
Fort Worth Star-Telegram.....	{ James M. North, Jr. Amon G. Carter..... }	Carter Publications, Inc.
Gainesville Register & Messenger.....	C. H. Leonard.....	Register Printing Co.
Galveston News.....	Louis C. Elbert.....	The News Publishing Co.
Galveston Tribune.....	Silas B. Ragsdale.....	Do.
Greenville Banner.....	Paul Ende Horton.....	Banner Publishing Co.
Greenville Herald.....	Tom R. Poole.....	The Herald Publishing Co.
Harlingen Valley Morning Star.....	Van R. Wiggins.....	The Valley Publishing Co.
Hillsboro Mirror.....	Mrs. Agnes Campbell.....	Texas Novelty Advertising Co.
Houston Chronicle.....	Jesse H. Jones.....	Houston Chronicle Publishing Co.
Houston Post.....	W. P. Hobby.....	Houston Printing Corporation.
Jacksonville Daily Progress.....	Raymond West.....	John E. McFarland & Raymond West.
Laredo Times.....	Wm. Prescott Allen.....	Laredo Daily Times, Inc.
Longview News.....	Carl L. Estes.....	The Longview News Co.
Longview Journal & Sunday News Journal.....	S. A. Parker.....	Do.
Lubbock Morning Avalanche.....	Parker F. Prouty.....	Avalanche-Journal Publishing Co., Inc.
Lubbock Journal.....	Charles A. Guy.....	Do.
Lamesa Dawson County Courier.....	Joe Alexander.....	Joe Alexander.
Lufkin News.....	Jack C. McDermott.....	The Lufkin Publishing Co.
McAllen Valley Evening Monitor.....	Si Casady.....	Valley Evening Monitor, Inc.
Marlin Democrat.....	J. M. Kennedy.....	J. M. Kennedy.
Marshall News-Messenger.....	Riley Cross.....	Marshall Publishing Co.
Midland Reporter-Telegram.....	James N. Allison.....	James N. Allison.
Odessa American.....	R. Henderson Shiffer.....	News-Times Publishing Co.
Orange Leader.....	J. B. Quigley.....	Orange Leader Publishing Co.
Palestine Herald.....	W. M. Hamilton.....	W. M. & H. V. Hamilton.
Palestine Press.....	Lester Hamilton.....	W. M. Hamilton & Sons.
Pampa Daily News.....	Tex De Weese.....	R. C., Clarence, Harry, Mabel Hoiles, Trustee Jane & Mabel Hoiles.
Paris News.....	A. G. Pat Mayse.....	North Texas Publishing Co.
Plainview Herald.....	Herbert S. Hilburn.....	Herald-News Publishing Co., Inc.
Port Arthur News.....	James E. Day.....	News Publishing Co.
San Angelo Times.....	Dean Chenoweth.....	San Angelo Standard, Inc.
San Angelo Evening Standard.....	Houston Harte.....	Do.

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TEXAS—continued

Newspaper	Representative	Member
San Antonio Express	F. G. Huntress	Express Publishing Co.
San Antonio Light	W. McIntosh	The Light Publishing Co.
San Antonio Evening News	F. G. Huntress, Jr.	Express Publishing Co.
Sherman Democrat	J. Newell Johnston	Sherman Democrat, Inc.
Sulphur Springs News-Telegram	Eric Bagwell	The Echo Publishing Co.
Temple Daily Telegram	Frank W. Mayborn	Bell Publishing Co.
Texarkana Gazette	Henry Humphrey	Texarkana Newspapers, Inc.
Tyler-Courier-Times	Mrs. T. B. Butler	Courier-Times Publishing Co.
Tyler Morning Telegraph	Mrs. S. C. Butler	Do.
Vernon Record	Raymond H. Nichols	The Vernon Record, Inc.
Waco News-Tribune	E. S. Fentress	Southern Publishing Co.
Waco Times-Herald	Frank Baldwin	Do.
Weatherford Herald	A. C. MacNelly	Herald Publishing Co.
Wichita Falls Record-News	B. D. Donnell	The Times Publishing Co.
Wichita Falls Times	Ed. Howard	Do.

UTAH

Ogden Standard-Examiner	A. L. Glasmann	Standard Examiner Publishing Co.
Salt Lake Deseret Evening News	Sylvester G. Cannon	Deseret News Publishing Co.
Salt Lake Telegram	Arthur L. Fish	Telegram Publishing Co.
Salt Lake Tribune	Thomas F. Kearns	The Salt Lake Tribune Publishing Co.

VERMONT

Barre Times	Dean H. Perry	Barre Daily Times, Inc.
Bennington Banner	F. E. Howe	Frank E. Howe.
Brattleboro Reformer	Howard C. Rice	Brattleboro Publishing Co.
Burlington Free Press	David W. Howe	The Free Press Association.
Burlington News	C. P. Hasbrook	Do.
Montpelier Argus	M. F. Atkins	The Argus & Patriot Co.
Newport Daily Express	Frank A. Hunt	Express & Standard Corp.
Rutland Herald	William Field	Harold & Globe Association.
St. Albans Messenger	William Loeb	St. Albans Publishing Co., Inc.
St. Johnsbury Caledonian-Record	H. A. Smith	The Caledonian-Record Publishing Co., Inc.

VIRGINIA

Bristol Herald-Courier	Charles J. Harkrader	Bristol Publishing Corp.
Bristol News-Bulletin	Mrs. L. M. Harkrader	Do.
Charlottesville College Topics	J. Gordon Lindsay	J. H. Lindsay, Inc.
Charlottesville Daily Progress	do.	J. G. Lindsay.
Covington Virginian	Richard F. Beirne, Sr.	The Covington Virginian, Inc.
Danville Bee	A. A. Farley	E. Stuart James.
Danville Register	Miss Sara C. Powell	Do.
Fredericksburg Free Lance-Star	Josiah P. Rowe, Jr.	The Free Lance Star Publishing Co., Inc.
Harrisonburg News-Record	H. F. Byrd	Rockingham Publishing Co.
Hot Springs Telegraph	Charles R. Barnes	The Covington Virginian, Inc.
Lynchburg Advance	Powell Glass	Carter Glass.
Lynchburg News	Carter Glass, Jr.	Do.
Martinsville Daily Bulletin	Wm. C. Barnes	The Bulletin Newspaper Corp.
Newport News Daily Press	Raymond B. Bottom	The Daily Press, Inc.
Newport News Times-Herald	Lewis T. Jester	Do.
Norfolk Ledger-Dispatch	S. L. Slover	Ledger-Dispatch Corp.
Norfolk Virginian-Pilot	P. S. Huber	Norfolk Newspapers, Inc.

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VIRGINIA—continued

Newspaper	Representative	Member
Petersburg Progress Index	L. B. Huber	Petersburg Newspapers, Corp.
Portsmouth Star	Norman R. Hamilton	Portsmouth Star Publishing Corp.
Pulaski Southwest Times	Howard R. Imboden	Southwest Publishing Co., Inc.
Richmond News-Leader	John Stewart Bryan	The News-Leader Co.
Richmond Times Dispatch	John D. Wise	Times-Dispatch Publishing Co., Inc.
Roanoke Times	William B. Smith	Times-World Corp.
Roanoke World-News	Junius P. Fishburn	Do.
Staunton Evening Leader	E. W. Opie	The Staunton Leader Publishing Co., Inc.
Staunton News-Leader	H. L. Opie	Do.
Strasburg Northern Virginia Daily	E. E. Keister	Shenandoah Publishing House, Inc.
Suffolk News-Herald	C. Marshall Johnson	Suffolk News Company, Inc.
Waynesboro News-Virginian	Louis Spilman	Waynesboro Publishing Corp.
Winchester Star	Harry F. Byrd, Jr.	E. Bolling Byrd.

WASHINGTON

Aberdeen World	W. A. Rupp	Grays Harbor Publishing Co., Inc.
Bellingham Herald	Charles L. Sefrit	Bellingham Publishing Co.
Bellingham Herald	Frank I. Sefrit	Do.
Bremerton News-Searchlight	John H. Jessup	W. B. Jessup & Sons, Inc.
Centralia Daily Chronicle	R. W. Edinger	The Centralia Printing Co.
Ellensburg Record	J. Clifford Kaynor	The Record Press, Inc.
Everett Daily Herald	Mrs. Gertrude D. Best	The Daily Herald Company.
Everett Daily Herald	Robert D. Best	Do.
Hoquiam Grays Harbor Washingtonian	Russell V. Mack	Grays Harbor Washingtonian, Inc.
Longview Daily News	J. M. McClelland	Longview Publishing Co.
Olympia Daily Olympian	O. W. Perkins	Washington Recorder Publishing Co.
Olympia Daily Olympian (Sun)	S. A. Perkins	Do.
Port Angeles Evening News	Charles N. Webster	Port Angeles Evening News, Inc.
Seattle Post Intelligencer	John Boettiger	Hearst Publications, Inc.
Seattle Times	Wm. K. Blethen	Seattle Times Company.
Spokane Chronicle	W. H. Cowles, Jr.	Spokane Chronicle Co.
Spokane-Spokesman-Review	W. H. Cowles	Cowles Publishing Co.
Tacoma Daily Ledger & Sunday Ledger	Frank S. Baker	The Tribune Publishing Co.
Tacoma News Tribune	Charles B. Welch	Do.
Vancouver Columbian	Richard L. Backman	Vancouver Evening Columbian.
Walla Walla Union-Bulletin	John G. Kelly	Bulletin Printing Co.
Walla Walla Union Bulletin & Sunday Union Bulletin	Donald C. Sherwood	Do.
Wenatchee Daily World	{ W. W. Woods Rufus Woods }	World Publishing Co.
Yakima Herald	W. H. Robertson	Republie Publishing Co.
Yakima Republic	Miss S. I. Anthon	Do.

WEST VIRGINIA

Beckley Post-Herald & Sunday Register	Ted McDowell	Beckley Newspapers Corp.
Beckley Raleigh Register	Charles Hodel	Do.
Bluefield Sunset News	H. I. Shott, Jr.	Daily Telegraph Printing Co.
Bluefield Telegraph	H. I. Shott	Do.

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WEST VIRGINIA—continued

Newspaper	Representative	Member
Charleston Daily Mail	Walter E. Clark	Charleston Mail Association.
Charleston Gazette	W. E. Chilton, Jr.	The Daily Gazette Co.
Clarksburg Exponent, Sunday Exponent-Telegram.	John S. Stump, Jr.	Clarksburg Publishing Co.
Clarksburg Telegram	Cecil B. Highland	Do.
Elkins Inter-Mountain	Roddin G. Bush	The Teter Publishing Co.
Fairmont Times	C. E. Smith	Fairmont Newspaper Publishing Co.
Fairmont West Virginia	Arlo DeBrucque	Do.
Grafton Sentinel	James F. Holt	Alice B. & Jas. F. Holt.
Hinton Daily News	Miss Margaret L. Ogden.	Hinton Daily News Co.
Huntington Advertiser	J. H. Long	Huntington Publishing Co.
Huntington Herald-Dispatch, Sunday Herald-Advertiser.	Dave Gideon	Do.
Logan Banner	Clarence H. Frey	The Logan Banner, Inc.
Martinsburg Journal	C. W. Morrison	Martinsburg Journal Co.
Morgantown Dominion News	Miss Jane Greer	W. Va. Newspaper Publishing Co.
Morgantown Post	Herbert C. Greer	Do.
Moundsville Echo	S. C. Shaw	S. C. Shaw.
Parkersburg News	W. E. Ingersoll	Parkersburg Publishing Co.
Point Pleasant Register	H. C. Clark	Point Pleasant Register Co.
Welch Daily News	W. R. Keyser	The Welch Publishing Co.
Wheeling Intelligencer & Sunday News.	H. C. Ogden	Intelligencer Publishing Co.
White Sulphur Evening Telegraph.	Richard F. Beirne, Jr.	The Covington Virginian, Inc.
Williamson Daily News	H. G. Clark	Williamson Daily News Co.

WISCONSIN

Antigo Daily Journal	Henry Berner	Berner Bros. Publishing Co.
Appleton Post-Crescent	Andrew B. Turnbull	Post Publishing Co.
Chippewa Falls Herald-Telegram	W. H. Gharrity	Herald-Telegram Publishing Co.
Eau Claire Leader	Marshall B. Atkinson	Eau Claire Press Co.
Eau Claire Telegram		Do.
Fond du Lac Commonwealth Reporter.	Charles F. Coffman	The Reporter Printing Co.
Green Bay Press-Gazette	Victor I. Minahan	Green Bay Newspaper Co.
Janesville Gazette	Robert W. Bliss	Gazette Printing Co.
Kenosha News	Ralph S. Kingsley	Kenosha News Publishing Co.
LaCrosse Tribune & Leader Press.	Wm. T. Burgess	The LaCross Tribune Co.
Madison Capital-Times	Wm. T. Evjue	The Capital Times Publishing Co.
Manitowoc Herald-Times	R. T. Bayne	Manitowoc Newspapers, Inc.
Marinette Eagle Star	Linwood I. Noyes	Eagle Printing Co.
Marshfield News-Herald	Howard A. Quirt	News Publishing Co.
Milwaukee Journal	Marvin H. Creager	The Journal Co.
Milwaukee Sentinel; Sunday Sentinel & Milwaukee Telegram.	H. H. Fris	American Newspapers, Inc.
Monroe Evening Times	Emery A. Odell	Emery A. Odell.
Oshkosh Daily Northwestern	Oscar J. Hardy	Oshkosh Northwestern Co.
Racine Journal-Times	F. R. Starbuck	The Journal Times Co.
Rhineland News	Clifford G. Ferris	Rhineland Publishing Co.
Shawano Evening Leader	Mrs. J. P. Heal	The Leader Publishing Co.
Sheboygan Press	C. E. Broughton	Press Publishing Co.

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WISCONSIN—continued

Newspaper	Representative	Member
Stevens Point Daily Journal	Guy W. Rogers	Journal Printing Co. of Stevens Point, Wis.
Superior Telegram	Morgan Murphy	Evening Telegram Co.
Two Rivers Reporter & Chronicle	Seymour Althen	Two Rivers Reporter, Inc.
Wausau Record-Herald	J. C. Sturtevant	The Record-Herald Co.
Wisconsin Rapids Daily Tribune	Wm. F. Huffman	Wisconsin Rapids Tribune Co.

WYOMING

Casper Tribune & Herald	J. E. Hanway	Times Publishing Co.
Cheyenne Wyoming State Tribune-Cheyenne State Leader	Tracy McCracken	Tribune Publishing Co.
Laramie Republican-Boomerang	C. Stanley Greenbaum	Republican Publishing Co.
Sheridan Press	D. P. B. Marshall	Sheridan Press, Inc.

[fol. 133] IN DISTRICT COURT OF THE UNITED STATES FOR THE
SOUTHERN DISTRICT OF NEW YORK

[Title omitted]

ANSWER OF THE ASSOCIATED PRESS, ET AL.

To the Honorable the Judges of the District Court of the
United States for the Southern District of New York:

Now come The Associated Press, Paul Bellamy, George Francis Booth, John Cowles, William Hutchinson Cowles, Edward King Gaylord, Houston Harte, Josh L. Horne, Clark Howell, Jr., Joseph Russell Knowland, Robert McLean, Leonard Kimball Nicholson, Frank Brett Noyes, Paul Patterson, Stuart Hoffman Perry, E. Lansing Ray, Edward Hubert Butler, The Adrian Telegram, The A. S. Abell Company, Bulletin Company, The Constitution Publishing Company, Cowles Publishing Company, The Evening Star Newspaper Company, The Kansas City Star Company, The Oklahoma Publishing Co., The Register and Tribune Company, Rocky Mount Publishing Co., Globe Democrat Publishing Co., San Angelo Standard, Inc., The Times-Picayune Publishing Company, The Tribune Publishing Co., and Worcester Telegram Publishing Co., Inc., defendants in the above entitled action, and by their attorneys, Milbank, [fol. 134] Tweed & Hope, for their answer to the complaint herein respectfully show upon information and belief as follows:

1. The Associated Press (hereinafter sometimes referred to as "AP") is a mutual cooperative enterprise dedicated to the maintenance of a complete, accurate and unbiased report of the news. It is neither a monopoly nor has it tended to become such. On the contrary, competition with AP has steadily increased since AP was organized, and such competition has been fostered rather than hindered by the very provisions of AP's bylaws which the Government now challenges as constituting an undue and unreasonable restraint of trade. Chief among such provisions are the requirements (1) that applicants for membership in a territory served by an existing member be admitted to membership only by the affirmative vote of not less than a majority of the members voting on the application, and (2) that regular members of AP furnish the news of their respective

localities only to AP, and that AP serve no newspapers other than those owned by its members. The bylaws of AP have contained such provisions for the past forty-two years. From time to time, between 1900 and April, 1942, applications of various owners of newspapers were acted upon by the members of AP in accordance with the first of said provisions. Some of such applications were granted and some rejected. In 1915, the then Attorney General of the United States rendered an official opinion that the said provisions were lawful:

“* * * it is no violation of the Anti-Trust Act for a group of newspapers to form an association to collect and distribute news for their common benefit, and to that end to agree to furnish the news collected by them only to each other or to the Association; provided that no attempt is made to prevent the members from purchasing or otherwise obtaining news from rival agencies. And if that is true the corollary must be true, namely, that newspapers desiring to form and maintain such an organization may determine who shall be and who shall not be their associates.

[fol. 135] “This, of course, is not to say that such an association might not develop into an unlawful monopoly. The facts adduced, however, in my opinion do not show that that has happened in the case of The Associated Press.”

The complaint does not allege, and it is not the fact, that AP prevents or attempts to prevent its members from purchasing or otherwise obtaining news from rival agencies. Instead of AP developing into a monopoly since the Attorney General rendered his opinion in 1915, the competition between AP and other news agencies has become increasingly severe.

2. For forty-two years the Government, well knowing the provisions of the bylaws now complained of and the rejection of certain applications for membership in AP, did not bring to any court or governmental body any complaint that the said provisions, or any of them, constituted an undue or unreasonable restraint of trade, or that AP had monopolized or attempted to monopolize the collection or distribution of news, or that AP had in any way violated the anti-trust statutes of the United States.

3. In December, 1941, one Marshall Field commenced publication in Chicago, Illinois, of a newspaper called *The Chicago Sun*. At the annual meeting of the members of AP in April, 1942, Field's application for membership was rejected by a vote of more than two to one. This action was instituted by the Government shortly thereafter.

4. It is the fundamental law of the land that no statute shall be so construed as to abridge the freedom of the press. A free press requires that newspapers shall be free to collect and distribute the news in accordance with principles and standards established by themselves, and that they shall be free to choose their associates in so doing. This right is now challenged by means of a novel interpretation of the anti-trust statutes, which is designed to foster a particular [fol. 136] newspaper, to wit, the said *The Chicago Sun*. A corollary of the assertion by the Government of the right to foster one newspaper is the assertion by the Government of the right to destroy another newspaper. A corollary of the assertion by the Government of the right to determine who may be associates in collecting and distributing news is the assertion by the Government of the right to determine what news shall be collected and distributed and under what conditions. The Congress has never asserted any right or power to regulate newspapers or news agencies in the collection or distribution of news.

5. The Associated Press is a mutual cooperative association of 1252 members who are the owners of newspapers published throughout the United States and in certain other parts of the world. As stated in its charter, AP is "a mutual and co-operative organization for the collection and interchange, with greater economy and efficiency, of information and intelligence for publication in the newspapers owned" by its members. AP is prohibited by its charter from making a profit or declaring dividends. The defendants deny the averment contained in paragraph 2 that AP is engaged in a commercial business.

6. AP was organized in 1900, and for forty-two years has been furnishing to its members a news service which the Government itself characterizes as embodying the highest standards of accurate, nonpartisan and comprehensive news reporting. The nature of the service furnished by AP and the resulting contribution which AP has made to the dis-

semination of complete and unbiased information of world events and conditions are not fortuitous, but stem from the very character of AP's organization. This in turn reflects the experience gained in a long-continued struggle by newspapers to obtain effective cooperative control over the news gathering and distributing facilities upon which they depend.

7. Prior to the formation in 1892 of The Associated Press of Illinois, the collection and distribution of the news of the [fol. 137] world had been largely restricted to agencies which were privately owned by small groups of newspapers. They dealt at arm's length with other newspapers to which they sold news at such profit as might be secured. Their newspaper customers had no control over the scope or character of the news reports which they purchased. Under such circumstances, the news agencies could obtain profits not only from the sale of their news reports to customers, but also from persons who, for a variety of reasons, were willing to pay for the privilege of having the news reports colored or distorted. Experience both in this country and throughout the world has long demonstrated that such is usually the result when no established cooperative news association exists to set the standard, and news gathering and distribution are restricted to commercial channels. Dissatisfaction with the privately owned and commercially operated news agencies culminated in the organization of The Associated Press of Illinois and the first practical application of the principle of world-wide cooperative news gathering by newspapers. This principle is the cornerstone of the present AP.

8. The membership of AP has more than doubled since its organization and its facilities for the gathering and distribution of news have been greatly expanded, but the basic pattern of AP and its method of operation have been substantially uniform during its entire history. Each member is under obligation to furnish to AP all of the "news of spontaneous origin" in the locality in which the member's newspaper is published. In turn, each member is entitled to receive from AP the news gathered by AP from all of its members (other than members in the same locality) and through other means. For the collection of news throughout the world, AP maintains its own news bureaus and employs its own correspondents. Such news,

together with that furnished by its members, AP distributes to its members through a country-wide network of leased wires and other means. The cost of the gathering and dis-[fol. 138] tribution of the news by AP is defrayed through assessments paid by its members.

9. The comprehensiveness of the news coverage by AP is dependent upon the cooperation of all its members in furnishing all the news of interest in their particular localities, and their willingness to expend time, effort and money to create and maintain an organization capable of gathering and distributing all news of importance with the greatest speed compatible with accuracy. The impartial and unbiased character of the news furnished to AP by its members and to the members by AP is assured by the fact that the membership represents a cross section of opinion on all issues of general interest, and by the fact that the membership has the power not only to control their cooperative enterprise but also to invoke disciplinary action against any member who departs from the standard of integrity in the reporting and publishing of AP news.

10. The basic reason why AP, in the language of the complaint (par. 66), "ranks in the forefront in public reputation and esteem" is that "the character of the organization of The Associated Press—a membership corporation composed of persons representing every shade of economic, political, and religious opinion and every section of the country—is an invaluable guarantee that the promise and claim made by each news-agency—that it presents the news without any political or sectional bias—will in fact be fulfilled." The good will which AP now enjoys results, again in the language of the complaint (par. 66), "from the fact that in the mind of the general public the name 'Associated Press' has long been regarded as synonymous with the highest standards of accurate, nonpartisan, and comprehensive news-reporting." If the members of AP were deprived of the right to choose their associates in the cooperative enterprise, the distinctive character of the organization would be destroyed and the assurance of an impartial and unbiased news report would no longer exist.

[fol. 139] 11. The claim of the Government that AP's bylaws constitute an undue and unreasonable restraint upon competition is without foundation in fact or in law.

It fails to take into account the radical difference between news and the source of news. It confuses the factors which create and maintain competition between newspapers and between news agencies. It disregards the established principle of law that news is property of which the owner has the right of disposition.

12. News is a report of the happening of an event. The source of news lies in the event itself. Access to the source of news is open to all who are willing to expend time, effort and money. News is, therefore, a product which has been created by initiative and enterprise and belongs to the producer. Its value is in direct proportion to its reliability and its newness.

13. If the news gathered through the cooperative facilities of AP and its members were required to be made available to every one, whether a member or not, ~~the incentive of each member to contribute his time, effort and money to the upbuilding of an organization for the mutual benefit of himself and of others making a like contribution would disappear.~~ No matter how great the contribution of the member had been, or over how long a period it had been made, he would enjoy no competitive advantage over others who had not thus ventured their time and resources. Under such circumstances, the loyalty so essential to the efficient and successful operation of a mutual enterprise could not survive. Instead of going beyond the letter of his obligation in order to maintain a superior service from which he hoped to derive his share of the benefit, each member would appraise his relationship to AP solely in the light of the immediate return to him. He would thereupon become merely a buyer and seller of news, and cooperation in a mutual enterprise would be replaced by arm's length bargaining. AP would become merely another commercial news agency.

[fol. 140] 14. The requirement of AP's bylaws that a newspaper published in the same locality served by an existing member may be elected to membership in AP only by vote of the membership is, in effect, merely a corollary of the requirement for the exclusive interchange of news between members through the agency of AP, and is in complete harmony with the theory and practice of a truly cooperative enterprise. The addition of another member

in a territory already served by an AP member does not increase the area or materially augment the scope of AP's news coverage, nor does it increase AP's revenues. If any one, merely by payment of a proportionate share of the cost of gathering and distributing the news, were automatically entitled to membership in AP, the members would cease to have any proprietary interest in the organization created and maintained through their mutual efforts. Through their continued loyalty to the enterprise, the members have created something of value to each, the benefits of which others should not be able to appropriate without making a commensurate contribution to the mutual cooperative undertaking. Automatic admission to membership, without a commensurate contribution and without the assent of a reasonable proportion of the members, would destroy the cooperative character of the enterprise.

15. The continuance of AP as a mutual cooperative enterprise enlisting the loyalty and proprietary interest of its members is of far greater importance to local newspapers in small communities than it is to large metropolitan newspapers. One reason for this is that local newspapers in small communities must place greater reliance upon a news agency for adequate news coverage; another reason is that such newspapers usually lack the financial resources with which to compete against a newspaper which is launched by a powerful individual or group of individuals for the particular purpose of accomplishing some selfish end.

16. However serious to each individual member the loss of his proprietary interest in AP and such resulting competitive advantage as he may enjoy, the loss to the public would be incomparably greater. The destruction of the cooperative principle in news gathering and distribution would place these functions, so vital to the national welfare, once again exclusively in commercial channels. The standard of an impartial and unbiased reporting of the news which has been achieved by the operation of AP under the control of its members, could not survive the transition of such members to the role of mere customers purchasing news on a price basis.

17. When AP was organized in 1900, there were no other news agencies of comparable size or importance. In

1907, the present United Press Associations (hereinafter sometimes referred to as "UP"), and in 1909, International News Service (hereinafter sometimes referred to as "INS") were established. Both UP and INS have largely expanded in the intervening years. The Government itself alleges that at the present time UP furnishes news to approximately 900 newspapers, as against 1246 in the United States presently served by AP; and that INS similarly serves approximately 325 newspapers. AP has never monopolized or attempted to monopolize the collection or distribution of news.

18. The growth of competing news agencies has been fostered instead of hampered by AP through the restriction of AP's service to its own members. Were AP obliged to admit to membership every newspaper which was prepared to pay its pro rata share of the cost of gathering and distributing the news, AP would not only become a commercial news agency but, in view of the good will attaching to its name over a long period of years, it might well become the only news agency furnishing complete news coverage. The presently unfounded charge of monopoly in the collection and distribution of news might then be substantiated in fact.

19. There can be no monopoly with respect to the sources of news which are open to anyone willing to expend the effort and money required to report them. Neither can there be a monopoly of the facilities for the transmission of news, which are, and throughout the history of AP have been, freely open to every one on the same terms.

20. Deny the averments contained in paragraph 3.

21. The averments contained in paragraphs 22 to 25 and 27 to 39, inclusive, that the defendants therein mentioned are engaged in interstate commerce, being conclusions of law, are neither admitted nor denied. The defendants deny the averments contained in paragraph 22 that Edward Hubert Butler is individually a member of AP and engaged in publishing the *Buffalo Evening News*, and aver that said Edward Hubert Butler is such member and so engaged individually and as trustee under the Last Will and Testament of Edward H. Butler, deceased.

22. Deny the averments contained in paragraph 26.

23. Deny the averments contained in paragraph 41.

24. The following averments contained in paragraph 42 are true: that newspapers supply a necessity and that their business affects the national interest; that public opinion is affected by the extent to which current, accurate and complete information of events and conditions throughout the world is made available; that the extent of such information has increased with the growth in number, range and complexity of public issues; and that the dissemination among the American people of fresh, accurate and worldwide news of current events and conditions through the instrumentality of newspapers is of vital importance to the national welfare. The defendants aver that AP was organized for the precise purpose of making possible the dissemination of such news, and that the cooperative character of its organization has been and is directly responsible for the accomplishment of such purpose and the rendering by AP of a service which the Government itself acknowledges to be of vital importance to the national welfare. The [fol. 143] defendants are without knowledge or information sufficient to form a belief as to the truth of the other averments contained in the said paragraph.

25. The following averments contained in paragraph 43 are true: that the national policy in favor of freedom of the press requires that newspapers be unhampered and unrestrained in selecting the particular news they choose to publish, in emphasizing it and in expressing any accompanying viewpoint or opinion, and that they be unhampered in their choice of and free competitive access to the sources of news. It is also true that the sources of news are the events which, when reported, become news itself; they do not embrace the persons by whom or the means through which the gathering and dissemination of the news are accomplished. The defendants deny that any public policy does or legally could require a cooperative news association to make its news reports—the product of its expenditure of effort, skill and money—available to anyone who might choose to utilize them. The sources of news are as freely open to anyone and everyone who may desire access to them as they are to AP. The defendants are without knowledge or information sufficient to form a belief as to the truth of the other averments contained in the said paragraph.

26. Are without knowledge or information sufficient to form a belief as to the truth of the averments contained in the first, third and fourth sentences of paragraph 44. All daily newspapers in this country have access to one or more news agencies and, in varying degrees, utilize the services thus afforded them. A number of individual newspapers and small groups of newspapers gather and distribute a large proportion of the news of outstanding world events printed by them and by others to whom such newspapers, in turn, sell the news so gathered and transmitted by their individual effort and initiative. The defendants deny that the meaning of the term "news agency" is correctly averred in the second sentence of the said paragraph.

[fol. 144] 27. The averment contained in paragraph 45 that news agencies have operated in this country for more than a century is true. The defendants are without knowledge or information sufficient to form a belief as to the truth of the other averments contained in the said paragraph.

28. Deny the averments contained in paragraph 46, except that there is a material difference in the service furnished by AP, and aver that some of the reasons for such difference are stated in paragraph 66 of the complaint.

29. Deny the averments contained in the first sentence of paragraph 47. The defendants are without knowledge or information sufficient to form a belief as to the truth of the other averments contained in the said paragraph.

30. Deny the averments contained in paragraph 48, and aver that news agencies are not common carriers or public utilities. The defendants further aver that the character of AP's organization, which the complaint seeks to destroy, is an essential factor in making possible the continuance of the service which AP now renders.

31. Deny the averments contained in the third sentence of paragraph 49.

32. Deny the averments contained in the third, fourth, fifth, seventh and twelfth sentences of paragraph 51.

33. Deny the averments contained in paragraph 52, and for the true purport and meaning of the contracts mentioned

therein, refer to the originals thereof to be produced at the trial.

34. Deny the averments contained in paragraph 56, and for the true purport and meaning of the contracts mentioned therein, refer to copies thereof attached to the complaint as Exhibits C, D and E.

35. Deny the averments contained in the first sentence of paragraph 57. The defendants are without knowledge [fol. 145] or information sufficient to form a belief as to the truth of the other averments contained in the said paragraph, except the averments following the semi-colon in the last sentence.

36. Deny the averments contained in paragraph 59, except the averment in the last sentence thereof as to the percentage of AP members not holding bonds.

37. Deny the averments contained in the first sentence of paragraph 60.

38. Deny the averment contained in the first sentence of paragraph 61 that there are only three existing American news agencies and aver that there are now and for many years have been, in addition to the news agencies therein mentioned, several other news agencies and newspapers in the United States which are engaged in collecting and distributing news to multiple newspapers. The defendants deny the averments contained in the second sentence of the said paragraph, and are without knowledge or information sufficient to form a belief as to the truth of the averments contained in the third sentence of the said paragraph.

39. Are without knowledge or information sufficient to form a belief as to the truth of the averments contained in the first, second, third, fourth, fifth, eighth and ninth sentences of paragraph 63. Answering the averment contained in the seventh sentence thereof, the defendants aver that a news picture service, doing business under the name of Acme News Photos, Inc., is an affiliate of UP and is owned and controlled by the same or substantially the same persons as the persons who own and control UP, and that the said Acme News Photos, Inc. furnishes its news picture service to a large number of newspapers. The defendants deny the averments contained in the last sentence of the said paragraph.

40. Are without knowledge or information sufficient to form a belief as to the truth of the averment contained in paragraph 64 that the expenditures of INS for news gathering are now, and generally speaking always have been, less [fol. 146] than one-half those of AP and the averments contained in the last sentence of the said paragraph. The defendants aver that a news picture service, doing business under the name of International News Photos, is an affiliate of INS and is owned and controlled by the same person who owns and controls INS, and that the said International News Photos furnishes its news picture service to a large number of newspapers.

41. Deny the averments contained in the last sentence of paragraph 65, and are without knowledge or information sufficient to form a belief as to the truth of the other averments contained in the said paragraph, except the averment contained in the fourth sentence thereof.

42. Deny the averments contained in paragraph 67.

43. Deny the averments contained in the third sentence of paragraph 68.

44. Deny the averments contained in the first and second sentences of paragraph 69.

45. Deny the averments contained in the second, fourth and fifth sentences of paragraph 71.

46. Deny the averments contained in the first sentence of paragraph 73, and aver that news photo wire transmission facilities are maintained by affiliates of both UP and INS, among others; that these affiliates are owned and controlled by the same or substantially the same persons as the persons who own and control UP and INS; that such affiliates own and control picture transmitting devices protected by letters patent; and that each claims superiority over all others in respect of its news picture service.

47. Answering the averments contained in paragraph 74, aver that affiliates of both UP and INS supply multiple newspapers with a complete feature budget comprising news feature stories with and without illustrations, news cartoons, comic strips, and other departmental features; that these affiliates are owned and controlled by the same or substantially the same persons as the persons who own

[fol. 147] and control UP and INS; and that each claims superiority over all others in respect thereof.

48. Deny the averments contained in paragraph 75, except the averment contained in the first sentence thereof.

49. Deny the averments contained in the first and second sentences of paragraph 76. The defendants are without knowledge or information sufficient to form a belief as to the truth of the averments contained in the third, fourth and fifth sentences of the said paragraph.

50. Deny the averments contained in paragraph 77.

51. Deny the averments contained in paragraph 78.

52. Deny the averments contained in the first sentence of paragraph 79. The defendants deny the other averments contained in the said paragraph, and for the true purport and meaning of the charter and bylaws of the Illinois corporation, refer to copies thereof to be produced at the trial, if the same be relevant to the issues herein.

53. Deny the averments contained in the first sentence of paragraph 80, and for the true purport and meaning of the decision of the Supreme Court of Illinois mentioned therein, refer to a copy thereof to be produced at the trial if the same be relevant to the issues herein. The defendants deny the other averments contained in the said paragraph.

54. Deny the averments contained in the first sentence of paragraph 81.

55. Deny the averments contained in the first and second sentences of paragraph 82. The defendants deny the other averments contained in the said paragraph, and for the true purport and meaning of the bylaws mentioned therein, refer to a copy thereof attached to the complaint as Exhibit C.

56. Deny the averments contained in paragraph 83, and for the true purport and meaning of the bylaws mentioned therein, refer to a copy thereof attached to the complaint as Exhibit C.

[fol. 148] 57. Deny the averments contained in the first and second sentences of paragraph 84, and for the true purport and meaning of the bylaws mentioned therein, refer to

copies thereof attached to the complaint as Exhibits C, D and E. The defendants deny the other averments contained in the said paragraph.

58. Deny the averments contained in the third sentence of paragraph 85.

59. Deny the averments contained in the first, second and fifth sentences of paragraph 86. The defendants are without knowledge or information sufficient to form a belief as to the truth of the averments contained in the seventh sentence thereof, except that the directors recommended election of the applicants for membership. Answering the averments contained in the third sentence of the said paragraph, the defendants aver that rights of protest were subsequently waived in respect of a large number of such applications, and that more than forty such applicants have been admitted to membership. The defendants further aver that nearly one-half of the present members of AP have been admitted to membership through waivers of rights of protest.

60. Deny the averments contained in paragraph 87, and for the true purport and meaning of the bylaws mentioned therein, refer to copies thereof attached to the complaint as Exhibits C and D.

61. Deny the averments contained in the first sentence of paragraph 88.

62. Deny the averments contained in paragraph 89, and aver that the primary consideration which has guided the directors in their determination in respect of the admission of applicants for membership has been the continued maintenance of AP as a cooperative association dedicated to the principle of a complete, accurate and unbiased report of the news.

63. Deny the averments contained in paragraph 90.

[fol. 149] 64. Deny the averments contained in paragraph 91.

65. Deny the averments contained in paragraph 93, and for the true purport and meaning of the bylaws mentioned therein, refer to a copy thereof attached to the complaint as Exhibit E.

66. Deny the averments contained in paragraph 94, and for the true purport and meaning of the bylaws mentioned therein, refer to copies thereof attached to the complaint as Exhibits C, D and E.

67. Deny the averments contained in paragraph 95.

68. Deny the averments contained in paragraph 96, and for the true purport and meaning of the bylaws mentioned therein, refer to a copy thereof attached to the complaint as Exhibit E.

69. Deny the averments contained in paragraph 97, and for the true purport and meaning of the bylaws mentioned therein, refer to a copy thereof attached to the complaint as Exhibit E.

70. Deny the averments contained in paragraph 98.

71. Deny the averments contained in paragraph 99, and for the true purport and meaning of the bylaws mentioned therein, refer to a copy thereof attached to the complaint as Exhibit E.

72. Deny the averments contained in paragraph 100, and for the true purport and meaning of the bylaws mentioned therein, refer to a copy thereof attached to the complaint as Exhibit E.

73. Deny the averments contained in paragraph 101, except in the last sentence thereof, and aver that the vote of the members of AP at the annual meeting in April, 1942 rejecting the application for membership of Marshall Field as the sole owner of *The Chicago Sun* was largely, if not entirely, due to three obstacles erected by Field and by representatives of the Anti-Trust Division of the Department of Justice. The first obstacle was the fact that Field, coincident with his so-called application for membership, charged that AP was engaged in a conspiracy to violate the anti-trust laws. In substance, Field's action was a threat of litigation and not a *bona fide* application for membership in AP. The second obstacle was the fact that Field admitted that he had not acquired any newspaper plant or press with which to publish *The Chicago Sun*. There was no assurance, therefore, that he intended to continue with reasonable permanence the publication of a newspaper after

the exigencies of a particular political controversy should have ceased to exist. The third obstacle was the fact that, between the time when Field filed his application and the date of the annual meeting of AP at which action thereon was taken, many members of AP were interrogated by agents of the Anti-Trust Division of the Department of Justice concerning their attitude toward the application of Field. The scope and character of the interrogations by these agents caused many members to believe that the Anti-Trust Division intended thereby to intimidate the members into voting in favor of Field's application.

74. Deny the averment contained in paragraph 103 that Illinois Publishing & Printing Company did not utilize its AP morning membership except for the Sunday edition of the *Chicago Herald-American*.

75. Deny the averments contained in the first sentence of paragraph 104, except that Field is a responsible person in the sense that he is possessed of immense wealth, and aver that the publication of *The Chicago Sun* by Field, as the sole owner thereof, enables him to deduct from his personal income tax whatever loss he may sustain by reason thereof. The result is that the device through which Field publishes *The Chicago Sun* deprives the Government of a very large [fol. 151] amount of revenue and Field enjoys a corresponding subsidy at Government expense, which places him at a great competitive advantage over other newspaper owners who are engaged in the publishing of newspapers for a livelihood and who do not enjoy such a subsidy. The defendants deny the averments contained in the second sentence of the said paragraph.

76. Deny the averments contained in the second sentence of paragraph 105, and aver that Field, before this action was instituted, refused to enter into any contract for news picture service to *The Chicago Sun* with at least one other agency supplying such service on the ground that to do so would affect the prosecution of this action adversely to Field.

77. Answering the averments contained in the first sentence of paragraph 106, aver that many daily newspapers published in the morning are, and for many years have been, available to readers in Chicago and in the area of the Middle

West served by the *Chicago Daily Tribune*. The defendants deny the other averments contained in the said paragraph.

78. Answering the averments contained in paragraph 107, aver that the applications of Eleanor Medill Patterson as the sole owner of the *Washington Times-Herald* for membership in AP were rejected at the same meeting of the members of AP at which the application of Field for *The Chicago Sun* was rejected; and that the vote of the members rejecting the applications of Eleanor Medill Patterson was largely due to the disclosure of the activities of the Anti-Trust Division of the Department of Justice in respect of the applications of herself and Field. The defendants deny the averments contained in the last two sentences of the said paragraph.

79. Deny the averments contained in paragraph 108, except the averments contained in the first sentence thereof.

[fols. 152-153] Separate Defense

80. The alleged cause of action set forth in the complaint is based upon a construction of the Sherman Anti-Trust Act and the Clayton Act which violates the First Amendment to the Constitution of the United States in that, if the judgment prayed for herein were granted, it would abridge the freedom of the press.

Wherefore, the defendants and each of them pray that the complaint be dismissed.

Milbank, Tweed & Hope, By Timothy N. Pfeiffer, A Partner, 15 Broad Street, New York, N. Y. Attorneys for The Associated Press and the other defendants above named.

[fol. 154] IN THE DISTRICT COURT OF THE UNITED STATES
FOR THE SOUTHERN DISTRICT OF NEW YORK

[Title omitted]

ANSWER OF TRIBUNE COMPANY AND ROBERT RUTHERFORD
McCORMICK, DEFENDANTS

The defendants Tribune Company and Robert Rutherford McCormick, by Townley, Updike & Carter and Weymouth Kirkland, their attorneys, saving and reserving all

questions relating to the sufficiency of the complaint and of the many imperfections, repetitions, immaterialities and insufficiencies therein, make answer as follows:

Jurisdiction and Venue—Paragraphs 1 to 3, pp. 2 and 3 of the Complaint

Paragraph One. The venue of this action is not disputed. These defendants deny that the court has jurisdiction to grant the relief prayed for and assert that the granting of the relief prayed for would deny to the defendants rights guaranteed to them by the Constitution of the United States, including the guaranty that freedom of speech and of the press shall not be abridged.

Paragraph Two. The Associated Press, herein called AP, is a cooperative association of newspaper owners in [fol. 155] incorporated in the year 1900 under the Membership Corporations Law of the State of New York and is engaged in collecting and dispersing news, information and intelligence. AP is not engaged in any commercial business or in trade or commerce, nor is it engaged in interstate or foreign trade or commerce: these defendants pray that this denial of the allegations of paragraph 2 be considered as a denial of the same or similar allegations frequently repeated in various paragraphs of the complaint.

Paragraph Three. The acts and conducts of the defendants do not constitute any violations of the anti-trust laws of the United States: these defendants pray that this denial be considered as an answer to the several repetitions of the allegations of paragraph 3.

The Defendants—Paragraphs 4 to 41, pp. 3 to 10 of the Complaint

Paragraph Four. The defendant Robert Rutherford McCormick, herein called McCormick, is a resident of Du Page County, Illinois, not of Chicago, Illinois; he has been since April, 1927, a member of the Board of Directors of AP. The defendant Tribune Company is a corporation organized under special act of the legislature of the State of Illinois in 1861. It is and has been since 1847 engaged in publishing a newspaper at Chicago, Illinois. It is and has been a member of AP at all times since the incorporation of AP. It is not engaged in gathering and dissemi-

nating news in interstate or foreign commerce; it is not engaged in interstate or foreign trade or commerce; these defendants pray that this denial of the allegations of paragraph 37 be considered as a denial of the same or similar allegations frequently repeated in various paragraphs of the complaint.

[fol. 156] Paragraph Five. These defendants have no information sufficient to form a belief whether the statements describing the defendants, other than AP, Tribune Company and McCormick, in paragraphs 4 to 39 are correct and, therefore, ask leave to adopt the answer of each defendant as to such allegations.

Paragraph Six. These defendants raise no question concerning this suit as a class action, but deny that any offense is set forth in the complaint or has been committed.

The Importance of Newspapers—Paragraphs 42 and 43,
pp. 10 to 12 of the Complaint

Paragraph Seven. Newspapers and the press supply a necessity and are vital to the public interest. Paragraphs 42 and 43 of the complaint contain some of the factors indicative of the importance of newspapers and of the press; but there are many others. The prime importance of the press in this Republic is proved by the constitutional guaranty that Congress shall make no law abridging freedom of speech or of the press, and by the other constitutional guaranties which apply to all, including the press.

Paragraph Eight. The national policy of freedom of the press requires not only the objectives set forth in paragraph 43, but also that the government shall not interfere with free and unrestrained competition between newspapers; that the government shall not effect or grant a monopoly of the press or of the necessary implements of the press; that the government shall not determine or attempt to determine who may or may not publish a newspaper or who may or may not disseminate news nor the manner or methods by which news shall be disseminated, nor to whom. Another corollary of the national policy in this respect is that the government shall not interfere with [fol. 157] free and unrestrained competition between news-agencies; that the government shall not effect or grant a monopoly of news-agencies which are necessary implements

of the press; that the government shall not determine, or attempt to determine, who may or may not establish and operate a news-agency, or who may or may not disseminate news by means of news-agencies, nor the manner or method by which news shall be disseminated by news-agencies, nor to whom. Another corollary of such national policy is that newspapers shall be unhampered in the choice of and access to the various sources of news; but news-agencies are not sources of news—on the contrary, news-agencies exercise labor, art and skill in gathering, reporting, and disseminating news.

Paragraph Nine. There is not and cannot be a monopoly or restraint of access to the sources of news, except in so far as the government may impose prohibitions or censorship. A consequence of the national policy of freedom of the press is that as many newspapers be published as any citizen or group of citizens desire to publish, as is alleged in paragraph 43; but it is no part of this constitutional guaranty or national policy that the government shall interfere by rule, regulation or fiat to increase or lessen the number of newspapers now being published or that shall hereafter be published. The public interest is best served by having a press free from governmental regulation as to the number, kind and viewpoint. There are now no artificial or unnecessary restraints upon the establishment of newspapers, news-agencies or upon access to news sources; but, if the government shall succeed in its demands in this case, artificial and unnecessary restraints will thereby be imposed on newspapers and news-agencies in derogation of the constitutional guaranties, including that of freedom of the press.

[fol. 158] Paragraph Ten. The national policy of freedom of the press is as compelling as the national policy of freedom of speech. The press and the individual citizen are not alone to be free from restraints and controls previous to publication of their utterances but both are to be free from restraints or punishment subsequently, save only such discipline as is necessary and reasonable in the exercise of the police power of the government: both are to be free to utter or to remain silent. Freedom of speech and of the press is not alone embodied in the constitutional guaranty thereof: it lies deeply embedded in the history of our country, in the way of life of our people and in the very

concept of a republican form of government. Any compulsion by government forcing those possessing information to disseminate it at all or to disseminate it to any individual or to any group of individuals is an abridgment of freedom of speech and of the press in its most oppressive aspect, namely, control previous to publication.

Paragraph Eleven. The express constitutional guaranty of freedom of the press goes far beyond the guaranties implicitly afforded any other enterprise. The press is the only private enterprise expressly mentioned in our constitution. Even in matters in which ordinary establishments engaged in trade or commerce may be regulated, the inhibitions against control over the press must remain unimpaired. Governmental right to regulate trade and commerce can under no pretense supersede or nullify the force of the special guaranty of freedom of the press and of all that such guaranty connotes. For the same reasons the instrumentalities which serve the press are to be afforded protection against governmental encroachments. The attempt of plaintiff to induce one branch of the government—namely, the judiciary—to construe the anti-trust laws of the United States in a fashion that places the press on a common level with commercial or business enterprises [fol. 159] for the purpose of control and regulation is an assault upon the validity of the Bill of Rights and the other historic charters and precedents which have emancipated man from political servitude.

Paragraph Twelve. Another corollary of the national policy of freedom of speech and of the press is that such fundamental rights are of greatest importance, and yet they are most vulnerable, when our country is engaged in war—a war to preserve democratic processes here and elsewhere. These defendants specifically rely upon the continued acquiescence of plaintiff in the conduct of the affairs of AP from 1900 until the filing of this complaint, upon the written approval of the Department of Justice to the legality of AP operations in 1915, to be hereafter mentioned, and upon plaintiff's failure to take any action against AP until the nation has become preoccupied with winning the war and has relaxed its vigilance to preserve the guaranteed individual liberties.

The Importance of News-Agencies—Paragraphs 44 to 48,
pp. 12 to 14 of the Complaint

Paragraph Thirteen. The facts set forth in paragraphs 44 to 48 regarding the importance of news-agencies are substantially correct with the following exceptions:

(a) Contrary to the allegations of paragraph 46, there are in this country today more than three news-agencies. While AP, United Press Associations, hereinafter called UP, and International News Service, hereinafter called INS, are the largest existing today, the defendants state on information and belief there are many other news-agencies in this country and many in foreign countries.

(b) Contrary to the allegations of paragraph 47, news-agencies, however large and powerful they might become, [fol. 160] do not have the ability to dictate and determine the character of news available to newspapers. It is not true that the economic nature of the business of news-agencies is such that there is no present likelihood that any other organization comparable to any of the three existing news-agencies will undertake to serve American newspapers with news gathered on a comprehensive basis; on the contrary, should these three news-agencies and the many other news-agencies presently existing fail to serve their customers properly and economically, the forces of free competition, of which news-agencies "were of necessity born," would give birth to other news-agencies. There is no restraint whatsoever upon the establishment of other news-agencies by any individual or group of individuals. There is not and cannot be any restraint or monopoly by existing news-agencies of the source of news, access to news, transmission of news, editing of news or receipt of news.

(c) There are some differences in the character and extent of the service furnished by AP, UP, or INS, but, contrary to the allegations of paragraph 46, access to the service of any particular one of these news-agencies is not determinative of the success or failure of any individual paper. Many newspapers having AP alone, or UP alone, or INS alone, have been very successful, and many newspapers having access to one or more of these three agencies have failed of success. Innumerable factors other than news-agencies make for success or failure of an individual

paper, such as honesty, independence, ability to forecast public opinion, established reputation, editorial policy, design of the press and type, location of the paper, advertising confidence, comics, features, its personnel and other factors too numerous to mention. The New York News, a daily morning paper in New York, owned by a subsidiary of defendant Tribune Company, built up a circulation in excess of 1,000,000 in eight years after it commenced publication [fol. 161] before it secured AP service by purchase. The New York Mirror, a daily morning newspaper, had a circulation in excess of 700,000 before it secured AP. The Cleveland Press, an evening newspaper successful in its community, does not have AP service today. The same is true of the Pittsburgh Press, an evening newspaper, and the Washington Times-Herald. The Bronx News, an evening daily suburban newspaper, which successfully competes with the New York papers having AP, has a circulation in excess of 105,000, and does not employ AP. The Baltimore Evening Sun became the predominant evening newspaper in its community before receiving AP and while competing with the Baltimore News, a long established paper with AP service. The Hearst interests published with great success many morning and evening papers throughout the country in large centers of population in competition with AP papers without access either to AP or UP news service or news photo service. The New York Journal, an evening newspaper published by the Hearst interests, achieved and still maintains the largest evening circulation of any newspaper in America with INS service alone; only in the last three years has the New York Journal obtained AP and UP service. Other instances can be cited. There are in the United States today over 350 newspapers having UP service which have no AP opposition in their fields and which have made no application for AP membership.

(d) News-agencies are important to newspapers, as alleged in paragraphs 44 and 45; but it is not true that news-agencies are indispensable to the survival of any newspaper or that no daily newspaper can exist without access to the service of a news-agency. Generally speaking, it is obvious that newspapers would be unable to cover the news as broadly as they now cover it if they should be denied the [fol. 162] service of any news-agency as defined in the com-

plaint—i. e. if they should be denied the right to print any news save that gathered and reported by their own staffs.

Paragraph Fourteen. The product of AP is of great national importance, as alleged in paragraph 48; but, contrary to the allegations of paragraph 48, there are no “factors which justify the requirement that The Associated Press serve newspapers needing or desiring its service without undue discrimination * * *.” Being a private cooperative association, AP may serve whom it pleases and may refuse to serve whom it pleases for any reason whatsoever. AP is not a monopoly nor a quasi public service corporation which, by reason of law or historical precedent, must serve all comers in the manner that innkeepers, common carriers and the like must serve everyone. If the government should succeed in subjecting AP to this “requirement,” then AP, on account of the allegations of the complaint that its service is indispensable to all newspapers, would shortly embrace in its membership practically all newspapers in the country; it would thus by government fiat be transformed from a private enterprise into a public monopoly, subject to governmental domination as to rates, service, operation and the like. Since Tudor and Stuart times until this case, no government of an English-speaking people has attempted to establish a privilege, patent or monopoly of the dissemination of news. The totalitarian states of today establish monopolies and exclusive privileges for the purpose of dominating the lives of their peoples by domination of the monopolies thus established. The anti-trust laws of the United States were designed to prevent monopoly, not to foster monopoly.

Paragraph Fifteen. Defendants assert that the following allegations of paragraph 46 are incorrect: “Denial of such access”—i. e. access to such news-agency as an individual [fol. 163] newspaper may deem best adapted to its needs—“directly restrains interstate commerce in news to and from such newspaper and the agency to which it is denied access and likewise constitutes a burden and restraint upon the newspaper’s own interstate circulation.” This assertion of the government’s prerogative to establish a monopoly in news services and to require news services to furnish news to any newspaper which applies therefor under the pretext that a denial of such access constitutes restraint of

trade in violation of the anti-trust laws of the United States is a subversion of the purposes and objects of the anti-trust laws and is contrary to the spirit and genius of a republican form of government.

Paragraph Sixteen. These defendants are advised that, should this court establish a precedent by granting the relief prayed for, courts hereafter would be required in proper cases to determine whether the rates charged by AP for its service are fair and reasonable, whether the news service furnished by AP is discriminatory or reasonably designed to meet the requirements of all its customers, whether its budget is too high or too low and generally to control and dominate the affairs of AP in the same fashion that public utilities are now controlled and dominated by governmental authority. The American press of today is superior to any press of the world; this preeminence is due, defendants believe, to the absence of governmental dominance and to the presence of the play of free forces of competition. Should the government succeed in subjecting AP and other news-agencies to governmental dominance, defendants believe that free competition between newspapers would be abolished, that competition between news-agencies would be abolished and that the freedom and preeminence of the American press would likewise be abolished.

[fol. 164] Paragraph Seventeen. The exercise of governmental control over newsgathering agencies or over their determination of the manner in which and through whom the news gathered by them shall be published is a direct interference with freedom of the press previous to publication. The business of news-agencies in collecting news and distributing the same through newspapers is affected with a national public interest, but that interest is not of the character charged in the complaint; on the contrary, the national public interest demands that every enterprise which enters into the production of published news remain free from governmental control or interference. News-agencies are simply instrumentalities which enter into the publication of newspapers and, therefore, are embraced in the constitutional guaranty of freedom of the press. Under the law they can no more be reduced to the status of public utilities than can any newspaper or any magazine which limits its circulation or selects the readers to whom it shall appeal.

The Associated Press—Paragraphs 49 to 60, pp. 14 to 22 of
the Complaint

Paragraph Eighteen. The facts set forth in paragraphs 49 to 60 regarding AP are substantially correct with the following exceptions:

(a) These defendants are informed and believe that the members of AP, being newspapers, are not engaged in commercial business, or in interstate trade and commerce—paragraph 49.

(b) These defendants are informed that many of the allegations of paragraph 51 are incorrect but, having no certain information thereof, ask leave to adopt the answer of the defendant AP as to paragraph 51.

(c) On information and belief, the vote of the bondholders of AP has never controlled the selection of directors: the same directors that were elected would have been elected had there been no votes cast by bondholders—paragraph 60.

Paragraph Nineteen. AP has non-exclusive contracts with the leading foreign news-agencies, and has exclusive contracts with its own subsidiaries, Press Association, Inc., La Prensa Asociada and The Associated Press of Great Britain Ltd.—paragraph 52. All foreign news-agencies which are not subsidiaries of AP are open to anyone desiring them. UP, INS, the Washington Times-Herald, the Chicago Sun and many others not members of AP receive news from such foreign news-agencies.

Paragraph Twenty. The collection of local news by members, which they agree to transmit exclusively to AP, as alleged in paragraphs 54, 71, 72 and elsewhere in the complaint, is a responsibility accepted in consideration for receiving AP service. This relieves AP to some extent from hiring correspondents locally. In fact, such is the purpose of the association—it is a mutual cooperative association. During the first twenty years of the existence of the original news-agency now known as AP, the mutual return of news by members was the only means employed by it to collect news; this predecessor of AP then hired no correspondents of its own. Yet AP does not now rely entirely upon its members for local news; it hires a great many correspondents in the United States and has offices and bureaus throughout the country. The provision in the by-laws re-

quiring a member to send its local news exclusively to AP is the same in principle as hiring exclusive local correspondents: it has never been contended that the newspapers cannot legally employ exclusive correspondents to seek out, report and transmit news. All other newspapers and news-agencies employ their staffs exclusively. The exclusiveness of the mutual return of local news by AP members to AP is not an unreasonable restraint of trade or commerce, nor does it tend toward monopoly; this has been admitted by the government of the United States at all times since the organization of AP and was specifically recognized in a formal written opinion of its Attorney General in 1915, to which reference shall hereafter be made. Exclusiveness of news features, editorial comment and the like is the greatest single factor in the making of competition between newspapers; to forbid it is to destroy competition. It is the legal right of any newspaper or any news-agency to purchase news reports with the condition that the seller shall not furnish it to others in the same city and "field." The Supreme Court of the United States has recognized the property right in news reports and has punished plagiarism or theft thereof. Exclusiveness is part and parcel of the newspaper profession: so much so that the supplement to the Oxford English Dictionary defines "exclusive" as "an article or paragraph exclusively contributed to a particular newspaper."

Paragraph Twenty-one. Associate members of AP are not required to furnish local news exclusively to AP but are free to furnish it to anyone. Associate members of AP receive all its news and other services at the same rates payable by regular members.

Description and Comparison of Existing News-Agencies—
Paragraphs 61 to 76, pp. 22 to 32 of the Complaint

Paragraph Twenty-two. A description of AP, UP and INS set forth on these pages is substantially correct as to the facts, with the following exceptions:

- (a) As stated above, there are many news-agencies other than AP, UP and INS—paragraph 61.
- [fol. 167] (b) While UP furnishes no picture news service, the Acme News Photos, Inc., herein called Acme, one of the best news photo services, is owned by the same interests that own UP—paragraph 63.

(c) Contrary to the allegations of paragraph 66, it is a common, usual and in fact almost a universal practice in the newspaper business that those who furnish news, news service, pictures, picture service, features, feature service, and the like to newspapers shall and do contract to furnish the same exclusively to only one newspaper in the same city and "field." The greatest arena of competition between newspapers in the same community is the search for exclusiveness of satisfaction of reader interest.

(d) The newspaper which does not obtain AP news service is not deprived nor restrained of its freedom in determining the character of its publication, nor from determining to what elements of the newspaper reading public it will address its appeal—paragraph 67. Many newspapers prefer UP alone without supplement by AP or INS; others prefer INS alone; these three news-agencies all appeal to substantially the same reader interest.

(e) The terms demanded by UP, INS and other news-agencies for their service are, defendants are informed and believe, fair and reasonable—paragraph 67. Defendants are informed and believe that should the terms of any news-agency be unreasonable, it would succumb to the free forces of competition and that other agencies would take its place.

(f) The news reports sent in by AP members to AP are not news sources—pararaph 71. As above stated, any person or group of persons has access to the sources of news except in so far as they may be denied access thereto by governmental censorship or prohibition.

[fol. 168] Paragraph Twenty-three. Whether a newspaper not carrying AP news operates under a competitive disadvantage with one carrying AP news—paragraph 69—cannot be answered as a universal. The Chicago Sun is not at a competitive disadvantage with the Chicago Tribune by reason of the fact that the Chicago Sun does not carry AP news. These defendants further are advised and believe that it is entirely immaterial to the issues of this case and to the relief prayed for whether or not the Chicago Sun, by reason of the foregoing, is at a competitive disadvantage with the Chicago Tribune; similarly, it is immaterial whether or not the Chicago Sun is at a competitive disadvantage because it is unable to obtain the services of first class reporters exclusively in the employ of the Chicago

Tribune, or to use the color presses owned exclusively by the Chicago Tribune, or to benefit by the reader habit which has been built up exclusively by the Chicago Tribune.

Paragraph Twenty-four. UP was organized in 1907 by the merger of three news-agencies which had previously served the entire country by certain mutual arrangements. Originally UP's clients were mostly afternoon newspapers but at the present time UP is also fitted for morning newspapers and serves both. Among its present morning clients are the New York Daily News, New York Times, New York Herald-Tribune and practically every other large morning newspaper with the exception of the Chicago Tribune. UP is in all respects substantially the same size as AP in number of employees, bureaus, amount of money spent and news it furnishes. UP is recognized as one of the great news-agencies of the world. It is and always has been in active competition with AP, both in the collection of news and in obtaining clients; many important morning and afternoon newspapers use UP, if not alone, in combination [fol. 169] with AP or INS. UP makes the following claims for its news, news pictures and feature service:

1. "The World's Best Coverage of the World's Biggest News."
2. It advertises from time to time that it furnishes more front page stories than AP.
3. "Wherever big news is breaking, United Press delivers the stories that make the headlines in the nation's newspapers."
4. It claims many scoops.
5. "The United Press has assigned the finest staff of correspondents ever assembled to the task of covering world-wide war developments for U.P. clients."
6. "An organization of highly trained, thoroughly experienced newspaper correspondents. Its corps of 1,500 full-time correspondents is supplemented by the services of 55,000 contributing correspondents—a total of 56,500 United Press noses for news."
7. It claims an "impressive list of beats, exclusives and eye-witness dispatches on war action."

8. "United Press provides consistently the fastest, the most complete, the best written coverage available."

Paragraph Twenty-five. While INS is smaller in size than AP and UP, it is nevertheless in active competition with both AP and UP and is recognized as one of the great news, news picture and feature agencies of the world. It claims to have a better foreign news service than any other news-agency. Its news picture service is operated by an affiliated corporation, International News Photos.

Paragraph Twenty-six. The exclusive return of local news by AP members does not compel AP competitors "to employ more costly and less efficient and complete means for gathering domestic news events of spontaneous origin"—paragraph 71. Defendants are informed and believe that [fol. 170] in the United States at present there are over 50,000 free lance correspondents or "string men" and that there are thousands of others available to newspapers and news-agencies on a piecework basis. Practically all of such correspondents are not permitted by their contracts to furnish news to two newspapers in the same town and field but are all free to furnish news service to papers not in the same town and field. There is and can be no monopoly or restraint of trade in obtaining local news. Neither UP, INS nor any other agency has ever complained that it has been restrained by AP in gathering and disseminating local news; on the contrary, UP and INS claim and have always claimed their local news service to be equal or superior to AP's.

Paragraph Twenty-seven. Contrary to the allegations of paragraph 73, no restraints are imposed upon interstate trade or commerce due to the fact that a newspaper is denied access to AP news reports or to the fact that AP furnishes exclusively to its members a wire news photo service. News-agencies, including AP, Acme and INS, and also news-photo-agencies and syndicates furnish wire news photos to their customers. At the present time all wire photo machines have about the same excellence of performance. Each particular service lays claim to the fact that it is the fastest and best.

Paragraph Twenty-eight. While AP supplies its members with "news feature stories with and without illustra-

tions, news cartoons, comic strips, and a full budget of departmental features," as alleged in paragraph 74, defendants say as follows:

(a) There are many other news-agencies and syndicates which supply and sell news feature service to their customers. AP's news picture service is not substantially different in size or coverage from the news picture service [fol. 171] furnished by other photo-agencies and syndicates. N.E.A. Service, Inc., owned by the same interests as UP, was the first news-agency to sell news features and AP inaugurated a news feature service so that it might favorably compete with N.E.A. and UP.

(b) There are a great many syndicates furnishing to newspapers feature stories with and without illustrations, columnists, news cartoons and comic strips, the number of which is to these defendants unknown. These features include a great variety of subjects, such as contract bridge, chess and checkers, crossword puzzles, anagrams, book reviews, readers' insurance, fashions, needlework, beauty hints, advice to the lovelorn, diets, editorial comment, sports comment, dogs, movie gossip, Katzenjammer Kids, Mutt and Jeff, Little Abner, Gumps, Orphan Annie, Dick Tracy, and others too numerous to mention. All of these features are sold by the agencies or syndicates which own them under the restriction that they shall be furnished to only one newspaper in the field or in the community. The value of such features to any one newspaper rests in its exclusive right to publish them. As in the case of news service, each newspaper claims advantage for its own features. Should the owner of such features be required to furnish them to every newspaper which applies for them, the value of such features would be greatly diminished and competition between newspapers and feature owners would to that extent be eliminated; yet, defendants are advised, should AP be required to furnish its service to all applicants, all news-agencies and all feature syndicates will be required by parity of reasoning to furnish their services to all applicants.

[fol. 172] The Offenses Charged Against the Defendants—
Paragraphs 77 and 78, pp. 32 to 34 of the Complaint.

Paragraph Twenty-nine. Defendants deny that any offense was committed by them under the anti-trust laws of

the United States or any other laws, and deny each and every allegation of paragraphs 77 and 78.

Paragraph Thirty. It is not true, as alleged in paragraph 78, that the defendants “continuously planned and acted together (a) to restrain the competitors of members of The Associated Press from obtaining access to AP’s services.” While it is true that AP, under its charter and by-laws, has not accepted for membership all newspapers that have applied for same, some of which were competitors of members of AP and some of which were not, this course of conduct did not and does not constitute an “offense.” Defendants are advised that it is not within the province of the government to require AP to accept as members competitors or non-competitors of members or to interfere with AP in respect to such matter. The defendants are advised that if AP were a monopoly—which it is not—the remedy afforded the government under the anti-trust laws of the United States would be to pray that AP be disestablished, or that its membership be reduced; but that the spirit and intent of the anti-trust laws of the United States forbid that AP be required to take any steps in the direction of monopoly by admitting all applicants.

The Years 1900 to 1928—Paragraphs 79 to 86; pp. 34 to 38
of the Complaint

Paragraph Thirty-one. The allegations of fact in paragraphs 79 to 86 are substantially correct. The interpretations of law and conclusions of fact therein set forth are incorrect in the following respects:

[fol. 173] (a) The Supreme Court of Illinois in *Inter-Ocean v. Associated Press*, referred to in paragraph 80, held that an Illinois corporation, not AP, defendant in this case, was impressed with a public interest and, therefore, was a public utility because its charter gave it the right of eminent domain to acquire telephone and telegraph wires and to operate the same. AP, defendant in this case, does not have the right of eminent domain nor does it have the right to operate utilities. The *obiter dicta* from this case quoted in paragraph 80, implying that newspapers and news-agencies are impressed with a public interest requiring them to serve all applicants, has been universally disapproved by the courts.

(b) The allegations of paragraph 82 *et seq.*, having to do with "veto" and "protest rights" are entirely immaterial, inasmuch as the "protest rights" were abolished in April, 1942, prior to the institution of this action.

(c) The "protest rights" under the old by-laws enabled a member in the field of an applicant to require the submission of that application to the entire membership for vote and automatically disenabled the Board of Directors to admit that applicant. This "protest right" was not a violation of the anti-trust laws of the United States, nor was its application by AP and the membership of AP in violation of the anti-trust laws of the United States, but was in furtherance of the lawful objects and purposes of AP as a mutual cooperative association—as was held in the formal opinion of a former Attorney General of the United States to be hereafter mentioned.

Paragraph Thirty-two. The practice alluded to in paragraph 84 of continuing AP memberships upon change in the ownership of any newspaper represented in the membership is a fair, just and equitable provision of the by-laws, not in violation of any law. Through this provision members who have contributed by way of assessment to building up the good will, patents and properties of AP are enabled, upon sale of their newspaper, to realize in some degree a return for such contributions. Assessments of AP members are not alone for current running expenses but for experiment, good will, long-term investments, equipment and the like; many members of AP, therefore, carry the membership on their books as of great asset value. Should AP members not be permitted to transfer AP privileges upon sale of their newspapers, these assets would be wiped out and many members would be seriously and adversely affected. These provisions for continuity of membership upon sale of a newspaper do not result in a static membership but, on the contrary, forty to fifty new members are admitted each year to membership and forty to fifty old members give up their membership in each year. Out of the total AP membership of approximately 1,300, approximately 400 have been admitted to membership in the past ten years. Such policy does not tend to limit the number of newspapers in the United States.

The Years 1928 to 1942—Paragraphs 87 to 91,
pp. 38 to 40 of the Complaint

Paragraph Thirty-three. The allegations of paragraphs 87 to 91 are substantially correct, with the following exceptions:

(a) On information and belief, of the four applications for membership submitted to a vote of the membership upon the exercise of "protest rights," two of such applicants were thereafter admitted to membership—paragraph 88.

(b) On information and belief, the directors did not follow a policy of excluding a competitor of members where no "protest right" was involved—paragraph 89; where [fol. 175] choice was possible, the directors pursued the policy of electing to membership the newspaper in the field which would in all probability be best able to fulfill the obligations of membership.

(c) The members and directors did not have a policy, the purpose and effect of which was to protect the AP members against competition by denying to their competitors access to the AP news service and by denying to them access to the news gathered by AP members—paragraph 89.

Paragraph Thirty-four. It is not true that the economic self-interest of AP is in favor of expanding AP membership freely—paragraph 90. Too great expansion of AP would result in (a) a very unwieldy organization composed of many not having the loyalty and the desire to serve and build up AP, as does the membership today; (b) AP news reports would no longer be exclusive and would, therefore, become common and less valuable; (c) the property rights and the good will value of AP built up through these many years by membership assessments, in addition to time and effort, would be destroyed; (d) there would be uneconomic duplication and multiplication of local news reports sent to AP by its members; and (e) AP membership might increase to such proportions that it might be constantly subjected to the charge of monopolization.

Recent Action taken by AP—Paragraphs 92 to 100,
pp. 40 to 47 of the Complaint

Paragraph Thirty-five. The allegations of paragraphs 92 to 100 are substantially correct with the following exceptions:

(a) The by-laws of AP as amended in 1942 do not achieve the result of excluding a competing applicant nor do such [fol. 176] by-laws make a sharp distinction between membership applications which do not affect the competitive interest of an existing member and those which do—paragraph 93.

(b) On information and belief, the money payment required under the amended by-laws was not designed, nor was it passed, with a purpose of excluding competition—paragraph 93; to the contrary this money payment was designed as recompense to an existing member for the decrease in value of his membership resulting from the taking away or dilution of the existing member's exclusive right to AP news service and to require the new member to pay, in part at least, for his participation in the fixed assets of AP. On information and belief, the money payment required by the by-laws has a direct relationship to value.

(c) The majority vote of the membership required in certain circumstances for election under the amended by-laws is not a prohibitive condition on admission to membership—paragraphs 94 and 95. A majority vote is the usual, customary and lawful requirement for election to mutual cooperative organizations in this country; in fact many such associations rightfully require a unanimous vote for admission of members.

(d) On information and belief, in voting upon applications for membership, members are not influenced by any improper or unlawful motives, nor are they improperly or unlawfully influenced by anyone to vote in any particular manner—paragraph 95.

(e) On information and belief, the contribution that an applicant must make under the amended by-laws is not computed arbitrarily without reference to net worth but, on the contrary has a direct relation to the value of the assets of AP in which the applicant, when admitted, shall share—paragraphs 94, 96, 97 and 98.

[fol. 177] (f) The requirement of payment by an applicant to members already in the field under the present by-laws does not permit existing members to profit by their own wrong—paragraph 98. The AP news which members currently receive does not constitute full and commensurate returns for their contributions—assessments or return of local news: a substantial portion of such assessments is and always has been expended for future betterment of AP service, patent improvements, employees' funds and other fixed assets.

(g) The provision of the amended by-laws requiring an applicant to give up to an existing member in the field any exclusive right to news or news picture service is not a barrier against admission, nor, on information and belief, was it passed for the purpose of excluding competitors—paragraphs 94 and 99. It is a fair standard for admission passed, defendants believe, for the purpose of requiring an applicant to relinquish his exclusive rights to news and news photo services in consideration of the relinquishment by the existing member of his exclusive rights to AP service or of the dilution of the rights of several members, should there be several in the field.

Paragraph Thirty-six. The government notified AP early in 1942 that it regarded the exclusion of applicants based upon no standards except competitive effect upon the business of individual members to be violative of the anti-trust laws—paragraph 92. The government asserted that AP must establish non-discriminatory standards for membership and must accept as members all applicants conforming to those standards. Certain officers and directors of AP, denying the government's position in point of fact or of law, nevertheless conferred with representatives of the government in an attempt to determine what standards for membership the government would allow. The representatives of the government refused at all times to consider the [fol. 178] permissibility of any standards other than (a) the applicant must be the sole owner of a newspaper, (b) must file proof thereof and of the "field," and (c) assent in writing to its legal by-laws. The government representatives arbitrarily refused to discuss other standards of admission which AP, even had it been a public utility, might lawfully have exacted e. g. (1) contribution to capital assets of AP to which the applicant had not contributed

but in which he would share; (2) the permanency of the newspaper of applicant; (3) the character of applicant and of his newspaper, and (4) others. Under threat of governmental prosecution, the members adopted the 1942 amendments in the vain hope that the government would be satisfied with less than the complete transformation of AP from a private mutual cooperative enterprise into one subservient to governmental domination as to membership, and therefore as to rates, service and the like.

Paragraph Thirty-seven. Representatives of AP, in answer to governmental threats of prosecution, pointed out to the representatives of the government that the by-laws of AP and their method of application were not in violation of any principles of law and have been specifically held innocuous by the courts of several States. In addition to these opinions, AP in its course of conduct specifically relied upon a formal opinion of Thomas Watt Gregory, former Attorney General of the United States, which he rendered in 1915. Gregory held in this opinion that the by-laws, and their application by AP, did not constitute any violation of the anti-trust or other laws of the United States. The conditions during the years between 1915 until the by-law amendments of 1942 above mentioned were and continued during the whole period to be substantially the same. The government during the period from 1915 to 1941, when these [fol. 179] threats were made as aforesaid, acquiesced in the correctness of the court decisions and in the legal opinion of Gregory. AP and the defendants during the period relied thereon and still rely thereon.

Paragraph Thirty-eight. Defendants are informed and believe that Eleanor Medill Patterson orally complained to the Department of Justice in 1939 or 1940. Marshall Field complained to the Department of Justice in late 1941 or early 1942. No action was taken by the Department of Justice on the complaint of Eleanor Medill Patterson until after the filing of the complaint by Marshall Field. The applications for membership of Field and Patterson came up for vote at the annual members' meeting held in April, 1942, under the amended by-laws as aforesaid. Prior to the meeting, proxies were sent to the members of AP by the directors of AP, by the Chicago Sun, by the Times-Herald, by the Hearst interest, and by the Chicago Tribune, to enable absent members to vote on these applications.

The Department of Justice sent its detectives or operatives throughout the country to call on AP members. These agents of the Department of Justice approached a great many AP members and asked questions and made statements which, it was thought, were designed to indicate the government's wishes and demands that Field be admitted. The votes of the membership at the meeting on these applications were as follows:

Admission of the Chicago Sun	For 287—Against 684
Admission of Times-Herald— Morning membership	For 242—Against 514
Admission of Times-Herald— Evening membership	For 242—Against 514

The government thereupon threatened AP that, unless AP should immediately furnish service *pendente lite* to the [fol. 180] Chicago Sun and the Times-Herald, the government would forthwith launch criminal proceedings against AP, its officers, directors and certain members; but that if AP would immediately furnish its service *pendente lite* to the Chicago Sun and the Times-Herald the government would not launch the criminal proceedings aforesaid but, on the contrary, would merely begin civil action.

Recent Exclusion of Applicants for Membership—Paragraphs 101 to 107, pp. 47 to 50 of the Complaint

Paragraph Thirty-nine. The allegations of paragraphs 101 to 107 are substantially correct, with the following exceptions:

(a) Defendants deny that there was a practice of excluding competitors simply because of the competition—paragraph 101.

(b) Whether or not Field is a responsible person, qualified in all respects to be a member of AP and to assume all of the legitimate obligations of AP membership, as alleged in paragraph 104, is entirely immaterial to the issues in this cause and to the relief prayed for. There are many factors which the members of AP consider when passing upon an application for membership, such as AP coverage in the community, number of newspapers in the field, type of newspaper, owner's qualifications, whether admission would add to AP's prestige, etc. All of these and others were neces-

sarily passed upon by the 684 members who voted to reject Field's application.

(c) The Chicago Sun has not been seriously handicapped in conducting its business by the denial of its application to AP membership—paragraph 104.

[fol. 181] (d) The Chicago Sun's lack of access to AP news picture service has not proved a great competitive disadvantage to the Chicago Sun—paragraph 105.

(e) The Chicago Tribune did not have a monopoly of the morning field in Chicago or in the large area of the Middle West tributary to Chicago with respect to morning delivery of a metropolitan newspaper—paragraph 106.

(f) The non-election of the Washington Times-Herald to AP membership did not restrain the Times-Herald in the conduct of its business, nor is the effect thereof that there is only one newspaper in the morning in Washington, D. C. and one in the evening which offer their readers AP news service—paragraph 107. On the contrary, the reading public of Washington, D. C. is afforded many morning and evening newspapers with AP service, from New York, Baltimore, Philadelphia, Richmond and elsewhere.

Paragraph Forty. In connection with Field's application, he informed AP that it was absolutely necessary to acquire an AP membership in order to serve the interests of the people of Chicago and to compete with other newspapers, as alleged in paragraph 103. This statement of Field contradicts what he has said elsewhere. On December 4, 1941, he said, "We have contracted with news gathering services that have world-wide facilities and long and sound experience." Since commencing publication of the Chicago Sun he has many times said that his facilities are complete, that his news coverage is the "best," and he has claimed on occasions to have scooped competitor newspapers. In connection with his offer to pay \$250,000 for the AP membership held by the Illinois Publishing and Printing Company for its newspaper, Chicago, Herald-American, defendants are informed and believe that Illinois Publishing and Printing Company would not sell its morning AP membership [fol. 182] because its membership was being utilized by it in publishing a Sunday morning newspaper, and also for its early week-day editions.

Paragraph Forty-one. Contrary to the allegations of Paragraph 105, Acme, one of the largest news photo services, does not have a regional exclusive contract which prevents the Chicago Sun from obtaining news pictures from it; nor is it true that it is a great competitive disadvantage to the Chicago Sun not to receive AP news picture service. Owing to the comparatively inexpensive method of transmitting photos by telephone in this country and by wireless from abroad, any newspaper can by its own initiative furnish its readers with up-to-the-minute news photographs. This is especially true of photographs of the war; practically every belligerent country, including the United States of America, requires photographs in war zones, notwithstanding the newspaper or agency represented by the photographers thereof, shall be pooled and released to all newspapers desiring same. In view of the large number of news photo services and the foregoing circumstances, defendants believe that the Chicago Sun's inability to obtain AP news picture service is not a great competitive disadvantage, but, on the contrary, that the Chicago Sun could furnish its readers with adequate news photographs if it would display initiative and diligence in obtaining the same.

Paragraph Forty-two. For two years prior to the time the Chicago Sun began publication, the Chicago Tribune, having the second largest circulation of any American newspaper, was the only daily morning newspaper published in Chicago, as alleged in paragraph 106. The Chicago Tribune did not have, prior to the advent of the Chicago Sun, a monopoly of the morning field in Chicago. There are many other morning newspapers—many of them being "metropolitan" newspapers—available to readers in the [fol. 183] Midwest from the States of Illinois, Indiana, Wisconsin, Michigan, Missouri and Iowa. There are in Chicago other newspapers on the news-stands at the same time that the Chicago Tribune is being sold. The afternoon newspapers come out early in the morning. They all have second class mail privileges and can be secured by anybody wishing to buy them. The Chicago Daily News, which has both UP and AP, is sold at nine in the morning. The Chicago Herald-American has UP, AP and INS, and is sold at eight A.M., during the week and on Sunday. The Chicago Times has AP—except on Sunday—and is sold at eight A.M. and on Sunday. These newspapers represented

all shades of political views and offered various choices for the readers of Chicago. The fact that the Chicago Tribune is so widely accepted in Chicago is the natural result of excellence in the field. The Chicago Tribune has been in business since 1847 and in 1861 was incorporated by special act of legislature. It has had a long and arduous career in obtaining the position it now enjoys. During this period many substantial morning papers have come and gone. It is preeminent in its field because of its tremendous reader acceptance, because of its outstanding facilities and its value to the readers in the community. Considerable of its good will is due to its personnel, the special features that it has inaugurated, its color presses, special inks, correspondents, comics and to many other factors. It has not bought up other newspapers and merged with them. The preeminence of the Chicago Tribune is due to the free play of the forces of competition and is neither "unwholesome" nor monopolistic. The defendants are advised and believe that it is not the province of the government to determine whether the newspaper situation in Chicago or elsewhere does or does not meet its views or the views of the current administration in charge of the [fol. 184] government in respect of wholesomeness, but that the province of the government is solely in respect of violations, if any, of law.

Paragraph Forty-three. The two other applications—one for an afternoon and the other for a morning membership—voted upon at the 1942 meeting were filed by Eleanor Medill Patterson—paragraph 107. There were "protests" when she first applied, but the vote on her admission was taken under the amended by-laws which had eliminated "protest" rights. The rejection of her application by AP did not restrain the Washington Times-Herald in the conduct of its business. Defendants deny that there was any combination to restrain or that her failure to be elected was the result of any combination. The Washington Times-Herald obtains the services of UP and INS, and without access to AP has built up the largest newspaper circulation in the City of Washington. Eleanor Medill Patterson claims that her newspaper is dominant in the field and that it has the most complete and best coverage of the news.

The Acquisition of Wide World Photos, Inc.—Paragraph
108, p. 51 of the Complaint

Paragraph Forty-four. In the year 1941 AP acquired the capital stock of Wide World Photos, Inc., a New York corporation, as alleged in paragraph 108. Defendants are advised that such acquisition was not in violation of the Sherman Act, or the Clayton Act, or any of the anti-trust laws of the United States and did not tend substantially to lessen competition in interstate commerce in news pictures, nor did it tend to create a monopoly in interstate commerce in such news pictures.

[fol. 185] Wherefore these defendants demand judgment against plaintiff herein, that the relief be denied and that this action be dismissed.

Townley, Updike & Carter and Weymouth Kirkland,
Attorneys for defendants Tribune Company and
Robert Rutherford McCormick, Office and post-
office address, 220 East 42nd Street, New York
City. By Weymouth Kirkland, Howard Ellis, J.
Howard Carter, David Fisher, Of Counsel.

[fol. 186] IN DISTRICT COURT OF THE UNITED STATES FOR
THE SOUTHERN DISTRICT OF NEW YORK

[Title omitted]

EXPEDITING CERTIFICATE

To the Clerk of the District Court of the United States for
the Southern District of New York:

I, Francis Biddle, Attorney General of the United States, hereby certify that the above entitled case now pending in said court is a civil action brought by the United States of America against The Associated Press and other defendants named in the complaint therein, under the Act of Congress approved July 2, 1890 (26 Stat. 209), entitled "An Act to protect trade and commerce against unlawful restraints and monopolies," as amended, and under the Act of Congress approved October 15, 1914 (28 Stat. 730), as amended, and that, in my opinion, said case is of general public importance.

I, therefore, request that, complying with the provisions of the Act of Congress entitled "An Act to expedite the

[fol. 187] hearing and determination of suits in equity pending or hereafter brought under the Act of July second, eighteen hundred and ninety, entitled 'An Act to protect trade and commerce against unlawful restraints and monopolies'; 'An Act to regulate commerce approved February fourth, eighteen hundred and eighty-seven, or any other Acts having a like purpose that may hereafter be enacted,' approved February 11, 1903 (32 Stat. 823), as amended by the Act of Congress approved April 6, 1942 (56 Stat. 291), you file this certificate among the records of the above entitled case and immediately furnish a copy thereof to the senior Circuit judge (or in his absence, the Presiding Circuit Judge) of the Second Circuit, to the end that three judges in such circuit, of whom at least one shall be a circuit judge, be designated to hear and determine said case, and that said case be assigned for hearing at the earliest practicable date and in every way expedited, as provided in said act of February 11, 1903, as amended.

Francis Biddle, Attorney General.

Washington, D. C., January 7, 1943.

[fols. 188-189] IN THE DISTRICT COURT OF THE UNITED STATES
FOR THE SOUTHERN DISTRICT OF NEW YORK

[Title omitted]

ORDER DESIGNATING THREE JUDGES TO HEAR CASE

I, Learned Hand, Senior Circuit Judge for the Second Circuit, having received from the Clerk of the District Court for the Southern District of New York, a copy of a certificate filed in the above-entitled action with the said clerk declaring that in the opinion of the Attorney General of the United States the case is of general public importance, do hereby in accordance with the Act of Congress, approved April 6, 1942 (56 Stat. 198), designate the following three judges in said circuit to hear and determine said case:

Learned Hand, Thomas W. Swan, Augustus N. Hand. Learned Hand, Circuit Judge.

[fol. 190] IN THE DISTRICT COURT OF THE UNITED STATES FOR
THE SOUTHERN DISTRICT OF NEW YORK

[Title omitted]

REQUEST FOR ADMISSIONS—Filed January 6, 1943

Plaintiff United States of America requests defendants The Associated Press, Paul Bellamy, George Francis Booth, John Cowles, William Hutchinson Cowles, Edward King Gaylord, Houston Harte, Josh L. Horne, Clark Howell, Jr., Joseph Russell Knowland, Robert Rutherford McCormick, Robert McLean, Leonard Kimball Nicholson, Frank Brett Noyes, Paul Patterson, Stuart Hoffman Perry, E. Lansing Ray, Edward Hubert Butler, The Adrian Telegram, The A. S. Abell Company, Bulletin Company, The Constitution Publishing Company, Cowles Publishing Company, The Evening Star Newspaper Company, The Kansas City Star Company, The Oklahoma Publishing Co., The Register and Tribune Company, Rocky Mount Publishing Co., Globe Democrat Publishing Co., San Angelo Standard, Inc., The Times-Picayune Publishing Company, Tribune Company, The Tribune Publishing Co. and Worcester Tele-[fol. 191] gram Publishing Co., Inc., and each of them, to make on or before January 20, 1943, the following admissions for the purpose of this action only and subject to all pertinent objections to admissibility which may be interposed at the trial.

That each of the following statements is true:

1-a. The Adrian Telegram is engaged, and has been engaged for a number of years, in the business of publishing and selling a newspaper for the purpose of deriving a profit.

1-b. The Adrian Telegram, in the ordinary course of its business, regularly receives and publishes in the State of Michigan news transmitted to it by The Associated Press from points located in states other than the State of Michigan, and has done so for a number of years.

1-c. The Adrian Telegram, in the ordinary course of its business, regularly receives and publishes in the State of Michigan news transmitted to it by news agencies other than The Associated Press or by reporters, correspondents,

or agents, from points located in states other than the State of Michigan, and has done so for a number of years.

1-d. The Adrian Telegram, in the ordinary course of its business, regularly transmits and delivers from points within the State of Michigan local news to The Associated Press at points located in states other than the State of Michigan, and has done so for a number of years.

1-e. The Adrian Telegram, in the ordinary course of its business, regularly delivers local news to The Associated [fol.192] Press in Michigan for transmittal by The Associated Press to points located in states other than the State of Michigan, and has done so for a number of years.

1-f. The Adrian Telegram, in the ordinary course of its business, sells and delivers in states other than the State of Michigan newspapers which it publishes within the State of Michigan, and has done so for a number of years.

1-g. The Adrian Telegram, in the ordinary course of its business, sells and delivers within the State of Michigan newspapers for sale and delivery in states other than the State of Michigan, and has done so for a number of years.

2-a. A. S. Abell Company is engaged, and has been engaged for a number of years, in the business of publishing and selling a newspaper for the purpose of deriving a profit.

2-b. The A. S. Abell Company, in the ordinary course of its business, regularly receives and publishes in the State of Maryland, news transmitted to it by The Associated Press from points located in states other than the State of Maryland, and has done so for a number of years.

2-c The A. S. Abell Company, in the ordinary course of its business, regularly receives and publishes in the State of Maryland news transmitted to it by news agencies other than The Associated Press or by reporters, correspondents, or agents, from points located in states other than the State of Maryland, and has done so for a number of years.

[fol.193] 2-d. The A. S. Abell Company, in the ordinary course of its business, regularly transmits and delivers from points within the State of Maryland local news to The Associated Press at points located in states other than the State of Maryland, and has done so for a number of years.

2-e. The A. S. Abell Company, in the ordinary course of its business, regularly delivers local news to The Associated Press in Maryland for transmittal by The Associated Press to points located in states other than the State of Maryland, and has done so for a number of years.

2-f. The A. S. Abell Company, in the ordinary course of its business, sells and delivers in states other than the State of Maryland newspapers which it publishes within the State of Maryland, and has done so for a number of years.

2-g. The A. S. Abell Company, in the ordinary course of its business, sells and delivers within the State of Maryland newspapers for sale and delivery in states other than the State of Maryland, and has done so for a number of years.

3-a. Bulletin Company is engaged, and has been engaged for a number of years, in the business of publishing and selling a newspaper for the purpose of deriving a profit.

3-b. Bulletin Company, in the ordinary course of its business, regularly receives and publishes in the State of Pennsylvania news transmitted to it by The Associated Press from points located in states other than the State of Pennsylvania, and has done so for a number of years.

[fol. 194] 3-c. Bulletin Company, in the ordinary course of its business, regularly receives and publishes in the State of Pennsylvania news transmitted to it, by news agencies other than The Associated Press or by reporters, correspondents, or agents, from points located in states other than the State of Pennsylvania, and has done so for a number of years.

3-d. Bulletin Company, in the ordinary course of its business, regularly transmits and delivers from points within the State of Pennsylvania local news to The Associated Press at points located in states other than the State of Pennsylvania, and has done so for a number of years.

3-e. Bulletin Company, in the ordinary course of its business, regularly delivers local news to The Associated Press in Pennsylvania for transmittal by The Associated Press to points located in states other than the State of Pennsylvania, and has done so for a number of years.

3-f. Bulletin Company, in the ordinary course of its business, sells and delivers in states other than the State of Pennsylvania, and has done so for a number of years.

3-g. Bulletin Company, in the ordinary course of its business, sells and delivers within the State of Pennsylvania newspapers for sale and delivery in states other than the State of Pennsylvania, and has done so for a number of years.

4-a. The Constitution Publishing Company is engaged, and has been engaged for a number of years, in the business [fol. 195] of publishing and selling a newspaper for the purpose of deriving a profit.

4-b. The Constitution Publishing Company, in the ordinary course of its business, regularly receives and publishes in the State of Georgia news transmitted to it by The Associated Press from points located in states other than the State of Georgia, and has done so for a number of years.

4-c. The Constitution Publishing Company, in the ordinary course of its business, regularly receives and publishes in the State of Georgia news transmitted to it by news agencies other than The Associated Press or by reporters, correspondents, or agents, from points located in states other than the State of Georgia, and has done so for a number of years.

4-d. The Constitution Publishing Company, in the ordinary course of its business, regularly transmits and delivers from points within the State of Georgia local news to The Associated Press at points located in states other than the State of Georgia, and has done so for a number of years.

4-e. The Constitution Publishing Company, in the ordinary course delivers local news to The Associated Press in Georgia, and has done so for a number of years.

4-f. The Constitution Publishing Company, in the ordinary course of its business, sells and delivers in states other than the State of Georgia newspapers which it publishes within the State of Georgia, and has done so for a number of years.

[fol. 196] 4-g. The Constitution Publishing Company, in the ordinary course of its business, sells and delivers within the State of Georgia newspapers for sale and delivery in states other than the State of Georgia, and has done so for a number of years.

5-a. Cowles Publishing Company is engaged, and has been engaged for a number of years, in the business of publishing and selling a newspaper for the purpose of deriving a profit.

5-b. Cowles Publishing Company, in the ordinary course of its business, regularly receives and publishes in the State of Washington news transmitted to it by The Associated Press from points located in states other than the State of Washington, and has done so for a number of years.

5-c. Cowles Publishing Company, in the ordinary course of its business, regularly receives and publishes in the State of Washington news transmitted to it by news agencies other than The Associated Press or by reporters, correspondents, or agents, from points located in states other than the State of Washington, and has done so for a number of years.

5-d. Cowles Publishing Company, in the ordinary course of its business, regularly transmits and delivers from points within the State of Washington local news to The Associated Press at points located in states other than the State of Washington, and has done so for a number of years.

5-e. Cowles Publishing Company, in the ordinary course of its business, regularly delivers local news to The Associated Press in Washington for transmittal by The Associated Press to points located in states other than the State of Washington, and has done so for a number of years.

5-f. Cowles Publishing Company, in the ordinary course of its business, sells and delivers in states other than the State of Washington newspapers which it publishes within the State of Washington, and has done so for a number of years.

5-g. Cowles Publishing Company, in the ordinary course of its business, sells and delivers within the State of Washington newspapers for sale and delivery in states other than the State of Washington, and has done so for a number of years.

6-a. The Evening Star Newspaper Company is engaged, and has been engaged for a number of years, in the business of publishing and selling a newspaper for the purpose of deriving a profit.

6-b. The Evening Star Newspaper Company, in the ordinary course of its business, regularly receives and publishes in the District of Columbia news transmitted to it by The Associated Press from points located in states outside the District of Columbia, and has done so for a number of years.

6-c. The Evening Star Newspaper Company, in the ordinary course of its business, regularly receives and publishes in the District of Columbia news transmitted to it by news agencies other than The Associated Press or by reporters, correspondents, or agents, from points located in states outside the District of Columbia, and has done so for a number of years.

6-d. The Evening Star Newspaper Company, in the ordinary course of its business, regularly transmits and delivers [fol. 198] from points within the District of Columbia local news to The Associated Press at points located in states outside the District of Columbia, and has done so for a number of years.

6-e. The Evening Star Newspaper Company, in the ordinary course of its business, regularly delivers local news to The Associated Press in the District of Columbia for transmittal by The Associated Press to points located in states outside the District of Columbia, and has done so for a number of years.

6-f. The Evening Star Newspaper Company, in the ordinary course of its business, sells and delivers in states outside the District of Columbia newspapers which it publishes within the District of Columbia, and has done so for a number of years.

6-g. The Evening Star Newspaper Company, in the ordinary course of its business, sells and delivers within the District of Columbia newspapers for sale and delivery in states outside the District of Columbia, and has done so for a number of years.

7-a. Forest City Publishing Company is engaged in the business of publishing and selling a newspaper for the purpose of deriving a profit.

7-b. Forest City Publishing Company, in the ordinary course of its business, regularly receives and publishes in the State of Ohio news transmitted to it by The Associated Press from points located in states other than the State of Ohio.

7-c. Forest City Publishing Company, in the ordinary course of its business, regularly receives and publishes in the State of Ohio news transmitted to it by news agencies [fol. 199] other than The Associated Press or by reporters, correspondents, or agents, from points located in states other than the State of Ohio.

7-d. Forest City Publishing Company, in the ordinary course of its business, regularly transmits and delivers from points within the State of Ohio local news to The Associated Press at points located in states other than the State of Ohio.

7-e. Forest City Publishing Company, in the ordinary course of its business, regularly delivers local news to The Associated Press in the State of Ohio for transmittal by The Associated Press to points located in states other than the State of Ohio.

7-f. Forest City Publishing Company, in the ordinary course of its business, sells and delivers in states other than the State of Ohio newspapers which it publishes within the State of Ohio.

7-g. Forest City Publishing Company, in the ordinary course of its business, sells and delivers within the State of Ohio newspapers for sale and delivery in states other than the State of Ohio.

8-a. The Kansas City Star Company is engaged, and has been engaged for a number of years, in the business of publishing and selling a newspaper for the purpose of deriving a profit.

8-b. The Kansas City Star Company, in the ordinary course of its business, regularly receives and publishes in the State of Missouri news transmitted to it by The As-

sociated Press from points located in states other than the State of Missouri, and has done so for a number of years.

[fol. 200] 8-c. The Kansas City Star Company, in the ordinary course of its business, regularly receives and publishes in the State of Missouri news transmitted to it by news agencies other than The Associated Press or by reporters, correspondents, or agents, from points located in states other than the State of Missouri, and has done so for a number of years.

8-d. The Kansas City Star Company, in the ordinary course of its business, regularly transmits and delivers from points within the State of Missouri local news to The Associated Press at points located in states other than the State of Missouri, and has done so for a number of years.

8-e. The Kansas City Star Company, in the ordinary course of its business, regularly delivers local news to The Associated Press in the State of Missouri for transmittal by The Associated Press to points located in states other than the State of Missouri, and has done so for a number of years.

8-f. The Kansas City Star Company, in the ordinary course of its business, sells and delivers in states other than the State of Missouri newspapers which it publishes within the State of Missouri, and has done so for a number of years.

8-g. The Kansas City Star Company, in the ordinary course of its business, sells and delivers within the State of Missouri newspapers for sale and delivery in states other than the State of Missouri, and has done so for a number of years.

9-a. The Oklahoma Publishing Co. is engaged, and has been engaged for a number of years, in the business of publishing and selling a newspaper for the purpose of deriving a profit.

9-b. The Oklahoma Publishing Co., in the ordinary course of its business, regularly receives and publishes in the State of Oklahoma news transmitted to it by The Associated Press from points located in states other than the State of Oklahoma, and has done so for a number of years.

9-c. The Oklahoma Publishing Co., in the ordinary course of its business, regularly receives and publishes in the State of Oklahoma news transmitted to it by news agencies other than The Associated Press or by reporters, correspondents, or agents, from points located in states other than the State of Oklahoma, and has done so for a number of years.

9-d. The Oklahoma Publishing Co., in the ordinary course of its business, regularly transmits and delivers from points within the State of Oklahoma local news to The Associated Press at points located in states other than the State of Oklahoma, and has done so for a number of years.

9-e. The Oklahoma Publishing Co., in the ordinary course of its business, regularly delivers local news to The Associated Press in the State of Oklahoma for transmittal by The Associated Press to points located in states other than the State of Oklahoma, and has done so for a number of years.

9-f. The Oklahoma Publishing Co., in the ordinary course of its business, sells and delivers in states other than the State of Oklahoma newspapers which it publishes within the State of Oklahoma, and has done so for a number of years.

[fol. 202] 9-g. The Oklahoma Publishing Co., in the ordinary course of its business, sells and delivers within the State of Oklahoma newspapers for sale and delivery in states other than the State of Oklahoma, and has done so for a number of years.

10-a. The Register and Tribune Company is engaged, and has been engaged for a number of years, in the business of publishing and selling a newspaper for the purpose of deriving a profit.

10-b. The Register and Tribune Company, in the ordinary course of its business, regularly receives and publishes in the State of Iowa news transmitted to it by The Associated Press from points located in states other than the State of Iowa, and has done so for a number of years.

10-c. The Register and Tribune Company, in the ordinary course of its business, regularly receives and publishes in the State of Iowa news transmitted to it by news agencies other than The Associated Press or by reporters, cor-

respondents, or agents, from points located in states other than the State of Iowa, and has done so for a number of years.

10-d. The Register and Tribune Company, in the ordinary course of its business, regularly transmits and delivers from points within the State of Iowa local news to The Associated Press at points located in States other than the State of Iowa, and has done so for a number of years.

10-e. The Register and Tribune Company, in the ordinary course of its business, regularly delivers local news to [fol. 203] The Associated Press in the State of Iowa for transmittal by The Associated Press to points located in states other than the State of Iowa, and has done so far a number of years.

10-f. The Register and Tribune Company, in the ordinary course of its business, sells and delivers in states other than the State of Iowa newspapers which it publishes within the State of Iowa, and has done so for a number of years.

10-g. The Register and Tribune Company, in the ordinary course of its business, sells and delivers within the State of Iowa newspapers for sale and delivery in states other than the State of Iowa, and has done so for a number of years.

11-a. Rocky Mount Publishing Co. is engaged, and has been engaged for a number of years, in the business of publishing and selling a newspaper for the purpose of deriving a profit.

11-b. Rocky Mount Publishing Co., in the ordinary course of its business, regularly receives and publishes in the State of North Carolina news transmitted to it by the Associated Press from points located in states other than the State of North Carolina, and has done so for a number of years.

11-c. Rocky Mount Publishing Co., in the ordinary course of its business, regularly receives and publishes in the State of North Carolina news transmitted to it by news agencies other than The Associated Press or by reporters, correspondents, or agents, from points located in states

other than the State of North Carolina, and has done so for a number of years.

11-d. Rocky Mount Publishing Co., in the ordinary course of its business, regularly transmits and delivers from points within the State of North Carolina local news [fol. 204] to The Associated Press at points located in states other than the State of North Carolina, and has done so for a number of years.

11-e. Rocky Mount Publishing Co., in the ordinary course of its business, regularly delivers local news to The Associated Press in the State of North Carolina for transmittal by The Associated Press to points located in states other than the State of North Carolina, and has done so for a number of years.

11-f. Rocky Mount Publishing Co., in the ordinary course of its business, sells and delivers in states other than the State of North Carolina newspapers which it publishes within the State of North Carolina, and has done so for a number of years.

11-g. Rocky Mount Publishing Co., in the ordinary course of its business, sells and delivers within the State of North Carolina newspapers for sale and delivery in states other than the State of North Carolina, and has done so for a number of years.

12-a. Globe Democrat Publishing Co. is engaged, and has been engaged for a number of years, in the business of publishing and selling a newspaper for the purpose of deriving a profit.

12-b. Globe Democrat Publishing Co., in the ordinary course of its business, regularly receives and publishes in the State of Missouri news transmitted to it by The Associated Press from points located in states other than the State of Missouri, and has done so for a number of years.

12-c. Globe Democrat Publishing Co., in the ordinary course of its business, regularly receives and publishes in [fol. 205] the State of Missouri news transmitted to it by news agencies other than The Associated Press or by reporters, correspondents, or agents, from points located in states other than the State of Missouri, and has done so for a number of years.

12-d. Globe Democrat Publishing Co., in the ordinary course of its business, regularly transmits and delivers from points within the State of Missouri local news to The Associated Press at points located in states other than the State of Missouri, and has done so for a number of years.

12-e. Globe Democrat Publishing Co., in the ordinary course of its business, regularly delivers local news to The Associated Press in the State of Missouri for transmittal by The Associated Press to points located in states other than the State of Missouri, and has done so for a number of years.

12-f. Globe Democrat Publishing Co., in the ordinary course of its business, sells and delivers in states other than the State of Missouri newspapers which it publishes within the State of Missouri, and has done so for a number of years.

12-g. Globe Democrat Publishing Co., in the ordinary course of its business, sells and delivers within the State of Missouri newspapers for sale and delivery in states other than the State of Missouri, and has done so for a number of years.

13-a. San Angelo Standard, Inc., is engaged, and has been engaged for a number of years, in the business of publishing and selling a newspaper for the purpose of deriving a profit.

13-b. San Angelo Standard, Inc., in the ordinary course of its business, regularly receives and publishes in the [fol. 206] State of Texas news transmitted to it by The Associated Press from points located in states other than the State of Texas, and has done so for a number of years.

13-c. San Angelo Standard, Inc., in the ordinary course of its business, regularly receives and publishes in the State of Texas news transmitted to it by news agencies other than The Associated Press or by reporters, correspondents, or agents, from points located in states other than the State of Texas, and has done so for a number of years.

13-d. San Angelo Standard, Inc., in the ordinary course of its business, regularly transmits and delivers from points within the State of Texas local news to The Associated

Press at points located in states other than the State of Texas, and has done so for a number of years.

13-e. San Angelo Standard, Inc., in the ordinary course of its business, regularly delivers local news to The Associated Press in the State of Texas for transmittal by The Associated Press to points located in states other than the State of Texas, and has done so for a number of years.

13-f. San Angelo Standard, Inc., in the ordinary course of its business, sells and delivers in states other than the State of Texas newspapers which it publishes within the State of Texas, and has done so for a number of years.

13-g. San Angelo Standard, Inc., in the ordinary course of its business, sells and delivers within the State of Texas [fol. 207] newspapers for sale and delivery in states other than the State of Texas, and has done so for a number of years.

14-a. The Times-Picayune Publishing Company is engaged, and has been engaged for a number of years, in the business of publishing and selling a newspaper for the purpose of deriving a profit.

14-b. The Times-Picayune Publishing Company, in the ordinary course of its business, regularly receives and publishes in the State of Louisiana news transmitted to it by The Associated Press from points located in states other than the State of Louisiana, and has done so for a number of years.

14-c. The Times-Picayune Publishing Company, in the ordinary course of its business, regularly receives and publishes in the State of Louisiana news transmitted to it by news agencies other than The Associated Press or by reporters, correspondents, or agents, from points located in states other than the State of Louisiana, and has done so for a number of years.

14-d. The Times-Picayune Publishing Company, in the ordinary course of its business, regularly transmits and delivers from points within the State of Louisiana local news to The Associated Press at points located in states other than the State of Louisiana, and has done so for a number of years.

14-e. The Times-Picayune Publishing Company, in the ordinary course of its business, regularly delivers local news to The Associated Press in the State of Louisiana for transmittal by The Associated Press to points located in states other than the State of Louisiana, and has done so for a number of years.

[fol. 208] 14-f. The Times-Picayune Publishing Company, in the ordinary course of its business, sells and delivers in states other than the State of Louisiana newspapers which it publishes within the State of Louisiana, and has done so for a number of years.

14-g. The Times-Picayune Publishing Company, in the ordinary course of its business, sells and delivers within the State of Louisiana newspapers for sale and delivery in states other than the State of Louisiana, and has done so for a number of years.

15-a. The Tribune Publishing Co. is engaged, and has been engaged for a number of years, in the business of publishing and selling a newspaper for the purpose of deriving a profit.

15-b. The Tribune Publishing Co., in the ordinary course of its business, regularly receives and publishes in the State of California news transmitted to it by The Associated Press from points located in states other than the State of California, and has done so for a number of years.

15-c. The Tribune Publishing Co., in the ordinary course of its business, regularly receives and publishes in the State of California news transmitted to it by news agencies other than The Associated Press or by reporters, correspondents, or agents, from points located in states other than the State of California, and has done so for a number of years.

15-d. The Tribune Publishing Co., in the ordinary course of its business, regularly transmits and delivers from points within the State of California local news to The Associated Press at points located in states other than the [fol. 209] State of California, and has done so for a number of years.

15-e. The Tribune Publishing Co., in the ordinary course of its business, regularly delivers local news to The As-

sociated Press in the State of California for transmittal by The Associated Press to points located in states other than the State of California, and has done so for a number of years.

15-f. The Tribune Publishing Co., in the ordinary course of its business, sells and delivers in states other than the State of California newspapers which it publishes within the State of California, and has done so for a number of years.

15-g. The Tribune Publishing Co., in the ordinary course of its business, sells and delivers within the State of California newspapers for sale and delivery in states other than the State of California, and has done so for a number of years.

16-a. Worcester Telegram Publishing Co., Inc., is engaged, and has been engaged for a number of years, in the business of publishing and selling a newspaper for the purpose of deriving a profit.

16-b. Worcester Telegram Publishing Co., Inc., in the ordinary course of its business, regularly receives and publishes in the State of Massachusetts news transmitted to it by The Associated Press from points located in states other than the State of Massachusetts, and has done so for a number of years.

16-c. Worcester Telegram Publishing Co., Inc., in the ordinary course of its business, regularly receives and publishes in the State of Massachusetts news transmitted to it, [fol. 210] by news agencies other than The Associated Press or by reporters, correspondents, or agents, from points located in states other than the State of Massachusetts, and has done so for a number of years.

16-d. Worcester Telegram Publishing Co., Inc., in the ordinary course of its business, regularly transmits and delivers from points within the State of Massachusetts local news to The Associated Press at points located in states other than the State of Massachusetts, and has done so for a number of years.

16-e. Worcester Telegram Publishing Co., Inc., in the ordinary course of its business, regularly delivers local news to The Associated Press in the State of Massa-

chusetts for transmittal by The Associated Press to points located in states other than the State of Massachusetts, and has done so for a number of years.

16-f. Worcester Telegram Publishing Co., Inc., in the ordinary course of its business, sells and delivers in states other than the State of Massachusetts newspapers which it publishes within the State of Massachusetts, and has done so for a number of years.

16-g. Worcester Telegram Publishing Co., Inc., in the ordinary course of its business, sells and delivers within the State of Massachusetts newspapers for sale and delivery in states other than the State of Massachusetts, and has done so for a number of years.

17-a. Tribune Company is engaged, and has been engaged for a number of years, in the business of publishing and selling a newspaper for the purpose of deriving a profit.

[fol. 211] 17-b. Tribune Company, in the ordinary course of its business, regularly receives and publishes in the State of Illinois news transmitted to it by The Associated Press from points located in states other than the State of Illinois, and has done so for a number of years.

17-c. Tribune Company, in the ordinary course of its business, regularly receives and publishes in the State of Illinois news transmitted to it by news agencies other than The Associated Press or by reporters, correspondents, or agents, from points located in states other than the State of Illinois, and has done so for a number of years.

17-d. Tribune Company, in the ordinary course of its business, regularly transmits and delivers from points within the State of Illinois local news to The Associated Press at points located in states other than the State of Illinois, and has done so for a number of years.

17-e. Tribune Company, in the ordinary course of its business, regularly delivers local news to The Associated Press in the State of Illinois for transmittal by The Associated Press to points located in states other than the State of Illinois, and has done so for a number of years.

17-f. Tribune Company, in the ordinary course of its business, sells and delivers in states other than the State

of Illinois newspapers which it publishes within the State of Illinois, and has done so for a number of years.

17-g. Tribune Company, in the ordinary course of its business, sells and delivers within the State of Illinois [fol. 212] newspapers for sale and delivery in states other than the State of Illinois, and has done so for a number of years.

18-a. Edward Hubert Butler, individually and as trustee under the Last Will and Testament of Edward H. Butler, deceased, is engaged, and has been engaged, for a number of years, in the business of publishing and selling a newspaper for the purpose of deriving a profit.

18-b. Edward Hubert Butler, individually and as trustee under the Last Will and Testament of Edward H. Butler, deceased, in the ordinary course of his business, regularly receives and publishes in the State of New York news transmitted to him by The Associated Press which news has been transmitted to the State of New York by The Associated Press from points located in states other than the State of New York and in foreign countries, and has done so for a number of years.

18-c. Edward Hubert Butler, individually and as trustee under the Last Will and Testament of Edward H. Butler, deceased, in the ordinary course of his business, regularly receives and publishes in the State of New York news transmitted to him by news agencies other than The Associated Press or by reporters, correspondents, or agents, from points located in states other than the State of New York, and has done so for a number of years.

18-d. Edward Hubert Butler, individually and as trustee under the Last Will and Testament of Edward H. Butler, deceased, in the ordinary course of his business, regularly [fol. 213] transmits and delivers from points within the State of New York local news to The Associated Press for redelivery by The Associated Press in states other than the State of New York, and has done so for a number of years.

18-e. Edward Hubert Butler, individually and as trustee under the Last Will and Testament of Edward H. Butler, deceased, in the ordinary course of his business, sells and

delivers in states other than the State of New York, newspapers which he publishes within the State of New York, and has done so for a number of years.

18-f. Edward Hubert Butler, individually and as trustee under the Last Will and Testament of Edward H. Butler, deceased, in the ordinary course of his business, sells and delivers within the State of New York newspapers which he publishes within the State of New York for sale and delivery in states other than the State of New York, and has done so for a number of years.

19-a. Each member of The Associated Press located in any of the States of the United States, and not specifically named a defendant, is engaged, and has been engaged for a number of years, in the business of publishing and selling a newspaper for the purpose of deriving a profit.

19-b. Each member of The Associated Press located in any of the States of the United States, and not specifically named a defendant, in the ordinary course of its business, regularly receives and publishes in the state in which its newspaper is published news transmitted to it by The Associated Press from points located in states other than the state in which its newspaper is published, and has done so for a number of years.

19-c. Each member of The Associated Press located in any of the States of the United States, and not specifically named a defendant, in the ordinary course of its business, regularly transmits and delivers from points within the state in which its newspaper is published local news to The Associated Press at points located in states other than the state in which its newspaper is published, and has done so for a number of years.

19-d. Each member of The Associated Press located in any of the States of the United States, and not specifically named a defendant, in the ordinary course of its business, regularly delivers local news to The Associated Press in the state in which its newspaper is published for transmittal by The Associated Press to points located in states other than the state in which its newspaper is published, and has done so for a number of years.

19-e. Each of a majority of the members of The Associated Press located in any of the States in the United States, and not specifically named defendants, is engaged, and has been engaged for a number of years, in the business of publishing and selling a newspaper for the purpose of deriving a profit.

19-f. Each of a majority of the members of The Associated Press located in any of the States of the United States, and not specifically named defendants, in the ordinary course of its business, regularly receives and publishes in the state in which its newspaper is published news transmitted to it by The Associated Press from points located in states other than the state in which its newspaper is published, and has done so for a number of years.

19-g. Each of a majority of the members of The Associated Press located in any of the States of the United States, and not specifically named defendants, in the ordinary course of its business, regularly transmits and delivers from points within the state in which its newspaper is published local news to The Associated Press at points located in states other than the state in which its newspaper is published, and has done so for a number of years.

19-h. Each of a majority of the members of The Associated Press located in any of the States of the United States, and not specifically named defendants, in the ordinary course of its business, regularly delivers local news to The Associated Press in the state in which its newspaper is published for transmittal by The Associated Press to points located in states other than the state in which its newspaper is published, and has done so for a number of years.

19-i. Each of a substantial number of the members of The Associated Press located in any of the States of the United States, and not specifically named defendants, in the ordinary course of its business, sells and delivers newspapers in states other than the state in which its newspaper is published, and has done so for a number of years.

[fol. 216] 19-j. Each of a substantial number of the members of The Associated Press located in any of the States of the United States, and not specifically named defend-

ants, in the ordinary course of its business, sells newspapers within the state in which its newspaper is published for sale and delivery in states other than the state in which its newspaper is published, and has done so for a number of years.

19-k. Each of a substantial number of the members of The Associated Press located in any of the States of the United States, and not specifically named defendants, in the ordinary course of its business, regularly receives and publishes in the state in which its newspaper is published news transmitted to it by news agencies other than The Associated Press or by reporters, correspondents or agents, from points located in states other than the state in which its newspaper is published, and has done so for a number of years.

20-a. The Associated Press, in a brief filed with the United States Bureau of Internal Revenue in April 1936 in support of a claim for exemption of The Associated Press from the taxes imposed by the Federal Social Security Act, made the following statement of fact with regard to the news furnished by The Associated Press:

Accurate and unbiased information of the functioning of courts, of government, of society in general; reports of discoveries in science; and knowledge of happenings in the neighborhood, nation, and world are not only essential before one can be considered educated but are vital to the efficient functioning of a democracy.

[fol. 217] 20-b. The statement quoted in the preceding paragraph is true.

21-a. There are no news-agencies operating in the United States other than The Associated Press, United Press Associations, and International News Service which are comparable to them in size and in scope and comprehensive of their operations in collecting and distributing to newspapers news originating in this country and in foreign countries.

21-b. There are no organizations operating in the United States other than The Associated Press, United Press Associations, and International News Service which individually undertake to, and do furnish to multiple newspapers

comprehensive reports of the news events of the world of all character.

22-a. Frank B. Noyes was President of The Associated Press from 1900 to April 1938.

22-b. Robert McLean has been President of The Associated Press from April 1938 to date.

22-c. Melville E. Stone was Secretary of The Associated Press from 1900 to April 1927.

22-d. Melville E. Stone acted as General Manager of The Associated Press from 1900 to 1925.

22-e. Kent Cooper has been Secretary of The Associated Press from April 1927 to date.

22-f. Kent Cooper has acted as General Manager of The Associated Press from 1925 to date.

22-g. For the fiscal year beginning in April 1941, the officers of The Associated Press were as follows:

President: Robert McLean
 First Vice-President: E. Lansing Ray
 Second Vice-President: Stuart H. Perry
 [fol. 218] Secretary: Kent Cooper
 Assistant Secretary: Lloyd Stratton
 Treasurer: L. F. Curtis
 Assistant Treasurer: Alan J. Gould

22-h. For the fiscal year beginning in April 1942, the officers of The Associated Press have been as follows:

President: Robert McLean
 First Vice-President: Houston Harte
 Second Vice-President: Arthur Hays Sulzberger
 Secretary: Kent Cooper
 Assistant Secretary: Lloyd Stratton
 Treasurer: L. F. Curtis
 Assistant Treasurer: Alan J. Gould

22-i. The Executive Committee of the Board of Directors of The Associated Press for the fiscal years beginning in April 1941 and in April 1942, was composed of the following:

Robert McLean
 E. Lansing Ray

Stuart H. Perry
 Paul Bellamy
 Frank B. Noyes
 Paul Patterson
 E. H. Butler.

22-j. Kent Cooper, Lloyd Stratton, L. F. Curtis and Alan J. Gould devote their full time to the business of The Associated Press and for the year 1941 they received the following compensation:

Kent Cooper—\$63,947.50
 Lloyd Stratton—\$20,000.00
 L. F. Curtis—\$14,000.00
 A. J. Gould—\$15,000.00

[fol. 219] 22-k. The entire news service and personnel of The Associated Press are exclusively under the direction, not of the president, but the general manager, by resolution of the Board of Directors.

22-l. The day-to-day business operations of The Associated Press in gathering and disseminating news are conducted by a staff of employees of The Associated Press headed by Kent Cooper, the general manager.

22-m. The general manager of The Associated Press is the executive head of The Associated Press.

22-n. The Associated Press, in a document entitled "SUMMARY OF FACTS CONCERNING THE ORGANIZATION AND OPERATION OF THE ASSOCIATED PRESS", filed with the United States Bureau of Internal Revenue in April 1936 in support of a claim for exemption of The Associated Press from taxes imposed by the Federal Social Security Act, made the following statements:

The officers of the AP in New York are a general manager, who also is the secretary, an assistant secretary and a treasurer. The general manager, who has two assistant general managers, is authorized by resolution of the Board of Directors to conduct the news service and engage the personnel. He acts as executive head of the organization.

22-o. The statements of fact quoted in the preceding paragraph were true.

22-p. The treasurer of The Associated Press, in an affidavit made August 12, 1937, and filed in the year 1937 with the United States Bureau of Internal Revenue in support [fol. 220] of the claim of The Associated Press for exemption from federal taxation, made the following statement:

The board of directors has conferred, however, upon the General Manager, executive control of, and responsibility for, the news service and personnel.

22-q. The statement quoted in the preceding paragraph is true.

23-a. The Associated Press as of March 1, 1942, had 16 associate members in continental United States.

23-b. The Associated Press as of March 1, 1942, had six regular members located in Alaska, three regular members located in Hawaii, four regular members located in the Philippine Islands, six regular members located in Mexico, three regular members located in Peru, one regular member located in Argentina, one regular member located in Ecuador, and one regular member located in Panama.

24-a. Exhibit No. 1, annexed hereto and made a part hereof, is a correct statement of the assets and liabilities of The Associated Press as of December 31, 1941.

24-b. Exhibit No. 2, annexed hereto and made a part hereof, is a correct statement of the revenue and expenses of The Associated Press for the year ended December 31, 1941.

24-c. The Associated Press in 1941 expended for salaries and wages an amount in excess of \$5,600,000.

24-d. The cost of operations of The Associated Press for [fol. 221] the year 1941 other than for salaries and wages amounted to \$5,210,909.47.

24-e. The Associated Press expended for leased wire rentals in 1941 the sum of \$2,199,752.50.

24-f. The Associated Press made expenditures in the year 1941 for domestic news collection and news distribution the sum of \$8,451,298.15.

24-g. In the year 1942 the Associated Press has been paying at the rate of about \$100,000 a month to bring news from Europe.

25-a. The Associated Press operates leased trunk wires in every state of the United States except Maine, New Hampshire, and Vermont.

25-b. As of August 18, 1942, The Associated Press employed 1940 full-time employees and, in addition, a large number of part-time employees.

25-c. Exhibit No. 3, annexed hereto and made a part hereof, is a correct copy of pages numbered 3, 4, 5, and 6 of a document published by The Associated Press in January 1940, entitled "The Associated Press Directory."

25-d. The statements of fact contained in Exhibit No. 3 are true.

26-a. The Associated Press has entered into contracts with certain foreign news agencies, namely, Reuters Limited, The Press Association Limited and The Telegraph Agency of the Union of Soviet Socialist Republics, whereby it has become entitled to receive news gathered by these agencies.

26-b. La Prensa Asociada, Inc., a corporation incorporated under the laws of the State of New York, is a wholly [fol. 222] owned subsidiary of The Associated Press.

26-c. The Associated Press of Great Britain Limited, a corporation incorporated under the laws of Great Britain, is a wholly owned subsidiary of The Associated Press.

26-d. The Associated Press has entered into contracts with La Prensa Asociada, Inc., The Associated Press of Great Britain Limited, and Press Association, Inc., whereby it has become exclusively entitled to receive all of the news gathered by these three corporations.

27-a. The Associated Press, in a document entitled "Summary of Facts Concerning the Organization and Operation of the Associated Press," filed with the United States Bureau of Internal Revenue in April 1936 in support of a claim for exemption of The Associated Press from the taxes imposed by the Federal Social Security Act, made the following statements relating to assessments upon AP members:

An assessment is against a field and is prorated according to the number served therein, as for example

two sharing members would each pay one-half of the assessment charged against the field. If one should terminate membership the other would pay the full amount.

27-b. The statements quoted in the preceding paragraph are true.

[fol. 223] 27-c. Exhibit No. 4, annexed hereto and made a part hereof, is a correct copy of a communication of Robert McLean, president of The Associated Press, to the members of The Associated Press and of a private circular, dated July 7, 1941, of L. F. Curtis, treasurer of The Associated Press to members of The Associated Press, enclosed with said letter.

27-d. The statements of fact contained in the communication and circular referred to in the preceding paragraph are true.

28-a. A duly authorized representative of The Associated Press supplied to the Department of Justice in June or July 1942, a statement of the names of all directors of The Associated Press since 1900 and the year or years of service of each director, a correct copy of which is annexed hereto and make a part hereof and marked Exhibit No. 5.

28-b. In Exhibit No. 5, where the year in the first column of figures is followed by a dash and no year appears in the second column of figures, this means that the service was continuous from the year shown in the first column to and including 1942.

28-c. The facts set forth in Exhibit No. 5 are true.

28-d. The directors of The Associated Press elected each year, beginning in 1937, from owners of newspapers published in cities or towns of less than 50,000 population have been Josh L. Horne, Stuart H. Perry, and Houston Harte.

28-e. Only 26 persons have been members of the Executive Committee of the Board of Directors of The Associated [fol. 244] Press from its organization in 1900 to date.

28-f. Each of the following persons died while he was a director of The Associated Press:

Harvey W. Scott
Charles W. Knapp

Herman Ridder
 Victor F. Lawson
 Clark Howell
 Adolph S. Ochs
 Charles Hopkins Clark
 Samuel Bowles
 Elbert H. Baker
 H. V. Jones
 Irwin R. Kirkwood
 Frederick E. Murphy

28-g. Each of the following persons voluntarily resigned as a director of The Associated Press:

Stephen O'Meara
 George Thompson
 Charles H. Grasty
 Albert J. Barr
 Thomas G. Rapier
 W. L. McLean
 William D. Brickell
 A. C. Weiss
 V. S. McClatchy
 Frederick Roy Martin
 Charles A. Rook
 D. E. Town
 Oswald Garrison Villard
 D. D. Moore
 Frank E. Gannett

28-h. It is stated in the annual reports of The Associated Press that each of the following persons resigned as a director of The Associated Press because he had sold or [fol. 225] otherwise disposed of his newspaper or newspapers, or his newspaper interest:

Charles H. Grasty
 Albert J. Barr
 A. C. Weiss
 V. S. McClatchy
 Charles A. Rook
 Oswald Garrison Villard
 D. D. Moore

28-i. It is stated in the annual reports of The Associated Press that George Thompson resigned as a director of The

Associated Press because he and another director had become associated in ownership of the same newspaper.

28-j. It is stated in the annual reports of The Associated Press that Thomas A. Rapier resigned as a director of The Associated Press because he was no longer a member of The Associated Press.

28-k. It is stated in the annual reports of The Associated Press that W. L. McLean resigned as a director of The Associated Press because the membership held by him had been transferred to his son.

28-l. It is stated in the annual reports of The Associated Press that Frederick Roy Martin resigned as a director of The Associated Press because he had been appointed assistant general manager of The Associated Press.

28-m. It is stated in the annual reports of The Associated Press that D. E. Town resigned as a director of The Associated Press because he was no longer actively engaged in the newspaper business.

[fol. 226] 28-n. It is stated in the annual reports of The Associated Press that Frank E. Gannett resigned as a director of The Associated Press because he was a candidate for the Republican nomination for President.

28-o. Each of the following persons while serving as a director of The Associated Press declined or refused nomination for election as a director of The Associated Press for a period beyond that for which he was then serving:

Whitelaw Reid
W. R. Nelson
Charles H. Taylor
John R. Rathom
Richard Hooker
Victor F. Ridder
Jerome D. Barnum

28-p. It is stated in the annual reports of The Associated Press that Don C. Seitz withdrew his nomination for election in 1901 as a director of The Associated Press.

28-q. It is stated in the annual reports of The Associated Press that B. H. Anthony was not nominated in 1932 for

election as a director of The Associated Press because of his ill health.

28-r. The only persons who, after serving as directors of The Associated Press, were nominated for election for a further period of service as directors and were defeated for election, were W. Y. Morgan, Frederick I. Thompson, and W. J. Pape.

28-s. Frederick I. Thompson, after being defeated for election as a director of The Associated Press in 1927, was [fol. 227] nominated and elected as a director in 1928 and was defeated for election as a director in 1933.

29-a. The number of newspaper owners, members of The Associated Press, each holding \$1,000.00 or more of the bonds of The Associated Press is less than 100.

29-b. Every member of The Associated Press holding bonds of The Associated Press has waived the right to receive interest on said bonds.

29-c. A report made by a committee of three appointed by the president of The Associated Press pursuant to a motion adopted by the Executive Committee of The Associated Press on May 26, 1926, to consider and report on the question of the bonds of The Associated Press contained the statements set forth in Exhibits No. 6, annexed hereto and made a part hereof.

29-d. The report of the committee referred to in the preceding paragraph was adopted by the Board of Directors of The Associated Press prior to the annual meeting of members in 1927 and was read at said annual meeting.

29-e. A report of a committee of six appointed by the president of The Associated Press pursuant to a resolution adopted at the annual meeting of members in 1927, to consider and make a report on the question of a redistribution of bonds of The Associated Press and on the question of an adjustment of protest rights of members of The Associated Press, contained the statements set forth in Exhibit No. 7, annexed hereto and made a part hereof.

29-f. The report of the committee referred to in the preceding paragraph was approved by the Board of Directors [fol. 228] of The Associated Press prior to the annual meeting of members in 1928 and at said annual meeting said

report was approved by the members and the directors were authorized to take all necessary steps to effectuate the recommendations made in the report.

30. The staffs of more than 1,200 newspapers in the United States gather news throughout the United States respecting unanticipated noteworthy events occurring in remote regions or small communities, such as airplane accidents, train wrecks, tornadoes, or mine disasters, which news is furnished to The Associated Press.

31-a. Press Association, Inc., is a corporation which was incorporated under the laws of the State of New York on October 14, 1940.

31-b. All of the capital stock of Press Association, Inc., is owned by The Associated Press.

31-c. The Associated Press caused Press Association, Inc., to be incorporated.

31-d. Press Association, Inc., is engaged in selling, principally to radio broadcasters, news, news pictures, features, and cartoon comics, including news, news pictures, features, and comics furnished to Press Association, Inc., by The Associated Press.

31-e. Press Association, Inc., is obligated to The Associated Press to furnish The Associated Press news, information and intelligence and news pictures which are collected by Press Association, Inc., and also was obligated to pay to The Associated Press the sum of \$10,000 monthly during the year 1942.

31-f. As at December 31, 1941, the books of Press Association, Inc., showed that it had total assets amounting to \$206,696.16 and total current liabilities of \$206,839.81, including an indebtedness to The Associated Press in the amount of \$159,419.25.

31-g. The Board of Directors of Press Association, Inc., for the year beginning in April 1942 have been, and are, the following: Paul Bellamy, Edward H. Butler, Robert McLean, Frank B. Noyes, Paul Patterson, Stuart H. Perry, E. Lansing Ray, and Kent Cooper.

31-h. The officers of Press Association, Inc., for the year beginning in April 1942 have been, and are, the following:

Chairman of the Board of Directors—Robert McLean, who is president and a member of the Board of Directors of The Associated Press; President—Kent Cooper, who is general manager of The Associated Press; Vice President—William J. McCambridge, who was, prior to 1941, the assistant general manager and the assistant secretary of The Associated Press; Secretary—Oliver S. Gramling; Treasurer—Robert R. Booth; Assistant Treasurer—William J. McCambridge.

31-i. From January 1941 to sometime in April 1942, the eight directors of Press Association, Inc., were the persons who constituted, during the corresponding period of time, the Executive Committee of the Board of Directors of The Associated Press and Kent Cooper, who, during the entire time, was general manager of The Associated Press.

31-j. During the entire period of its operations the principal place of business of Press Association, Inc., has been [fol. 230] 50 Rockefeller Plaza, New York, New York.

31-k. On or about January 24, 1941, The Associated Press issued and sent to its members a "Note to Editors," a correct copy of which is annexed hereto and made part hereof and marked Exhibit No. 8.

31-l. The statements of fact contained in Exhibit No. 8 are true.

32-a. Prior to March 1942, Press Association, Inc., made and issued to certain members of the public an advertising brochure a correct copy of which is annexed hereto and made a part hereof and marked Exhibit No. 9.

32-b. Press Association, Inc., has issued the brochure referred to in the preceding paragraph to numerous customers and potential customers of Press Association, Inc.

32-c. Said brochure was made and issued with the knowledge of the officers of Press Association, Inc.

32-d. Said brochure was made and issued pursuant to authorization of the Board of Directors of Press Association, Inc.

32-e. Said brochure was made and issued with the knowledge of the persons who then constituted a majority of the Executive Committee of The Associated Press.

32-f. Said brochure was made and issued with the consent of the persons who then constituted a majority of the Executive Committee of The Associated Press.

[fol. 231] 32-g. Said brochure was made and issued without objection on the part of any of the persons who then constituted the Executive Committee of The Associated Press.

32-h. Said brochure was made and issued with the knowledge of the salaried officers of The Associated Press.

32-i. Said brochure was made and issued without objection on the part of any of the officers of The Associated Press.

32-j. Said brochure was made and issued with the consent of certain of the officers of The Associated Press.

32-k. Said brochure was made and issued with the knowledge of the Board of Directors of The Associated Press.

32-l. Said brochure was made and issued without objection on the part of the Board of Directors of The Associated Press.

32-m. Said brochure was made and issued with the consent of the Board of Directors of The Associated Press.

32-n. The Associated Press has never, prior to the institution of this suit, denied any of the statements set forth in said brochure.

32-o. The Associated Press has never, prior to the institution of this suit, made any corrections or amendments to said brochure.

33-a. Melville E. Stone was, prior to May 16, 1900, the general manager of the Associated Press (of Illinois).

[fol. 232] 33-b. Exhibit No. 10, annexed hereto and made a part hereof, is a correct copy of the by-laws of the Associated Press (of Illinois) in effect immediately prior to September 30, 1900.

33-c. The Board of Directors of the Associated Press (of Illinois) on or about May 16, 1900, made a report to the stockholders of the Associated Press (of Illinois), a correct copy of which report is annexed hereto and made a part hereof, and marked Exhibit No. 11.

33-d. The stockholders of the Associated Press (of Illinois) at their meeting held in Chicago, Illinois, September 12-13, 1900, adopted the resolution, a correct copy of which is annexed hereto and made a part hereof, and marked Exhibit No. 12.

33-e. Frank B. Noyes, President of The Associated Press, a New York corporation, on or about September 14, 1900, issued and sent to the members of the Associated Press (of Illinois) the statement, a correct copy of which is annexed hereto and made a part hereof and marked Exhibit No. 13.

33-f. Charles W. Knapp, president of the Associated Press (of Illinois) on or about September 20, 1900, issued and sent to the members of the Associated Press (of Illinois) and the members of The Associated Press, a New York corporation, the statement, a correct copy of which is annexed hereto and made a part hereof and marked Exhibit No. 14.

33-g. Frank B. Noyes, president of the Associated Press, a New York corporation, on or about September 20, 1900, sent to the members of the Associated Press (of Illinois) [fol. 233] and the members of The Associated Press, a New York corporation, the notice, a correct copy of which is annexed hereto and made a part hereof and marked Exhibit No. 15.

33-h. Charles W. Knapp, president of the Associated Press (of Illinois), issued and sent to the members of the Associated Press (of Illinois) the statement dated September 21, 1900, a correct copy of which is annexed hereto and made a part hereof and marked Exhibit No. 16.

33-i. A committee of members of the Associated Press (of Illinois) appointed September 12, 1900, and consisting of the following: H. W. Scott, chairman; V. S. McClatchy, secretary; F. E. Whiting; F. D. White; H. J. Ford; M. D. Munn; H. H. Kohlsaat; John Hicks; D. A. Tompkins; F. G. Rapier, F. B. Noyes; E. C. Hughes, and P. H. Lannan, made a report dated September 21, 1900, to the members of the Associated Press (of Illinois), a correct copy of which is annexed hereto and made a part hereof and marked Exhibit No. 17.

33-j. A committee of the Board of Directors of the Associated Press (of Illinois) consisting of Charles W. Knapp, Victor F. Lawson, and Charles W. Grasty, sent to The Associated Press, incorporated under the laws of the State of New York, a communication dated September 18, 1900, a correct copy of which is annexed hereto and made a part hereof and marked Exhibit No. 18.

33-k. A committee of the Directors of The Associated Press, a New York corporation, composed of Stephen [fol. 234] O'Meara, William L. McLean, and Frank B. Noyes, sent a communication dated September 20, 1900, to Charles W. Knapp, Charles W. Grasty and Victor F. Lawson, constituting a committee of the Board of Directors of the Associated Press (of Illinois), a correct copy of which is annexed hereto and made a part hereof and marked Exhibit No. 19.

33-l. A committee of the Directors of The Associated Press, a New York corporation, composed of Stephen O'Meara, William L. McLean, and Frank B. Noyes sent a communication dated September 20, 1900, to Charles W. Knapp, Charles W. Grasty, and Victor F. Lawson, constituting a committee of the Board of Directors of the Associated Press (of Illinois), a correct copy of which is annexed hereto and made a part hereof and marked Exhibit No. 20.

33-m. The Board of Directors of The Associated Press, a New York corporation, on or about September 29, 1900, adopted a resolution, a correct copy of which is annexed hereto and made a part hereof and marked Exhibit No. 21.

33-n. The Board of Directors of The Associated Press, a New York corporation, on or about September 29, 1900, adopted a resolution, a correct copy of which is annexed hereto and made a part hereof and marked Exhibit No. 22.

33-o. Of the six incorporators of The Associated Press, namely, Stephen O'Meara, Adolph S. Ochs, St. Clair McKelway, William L. McLean, Frank B. Noyes, and Alfred H. Belo, Stephen O'Meara had been, prior to May 16, 1900, first vice-president of the Associated Press (of Illinois); [fol. 235]. Frank B. Noyes and William L. McLean had been, prior to May 16, 1900, Directors of the Associated

Press (of Illinois); St. Clair McKelway, Adolph F. Ochs, and Alfred H. Belo had been, prior to May 16, 1900, representatives of stockholders of the Associated Press (of Illinois).

33-p. Over 90% of the persons who were stockholders and members of the Associated Press (of Illinois) in 1900 became in that year members of The Associated Press.

33-q. The 278 members of The Associated Press who were given "protest rights" in 1900 when The Associated Press was organized had all been in the year 1900 holders of certificates of membership of Series A issued by the Associated Press (of Illinois).

33-r. The bonds of The Associated Press issued prior to 1928 were issued only to those members of The Associated Press who had been stockholders of the Associated Press (of Illinois) in the year 1900, or to successors of such members.

34-a. The president of The Associated Press at the annual meeting of AP members in 1922, in the course of his remarks to the meeting made the statements set forth in Exhibit No. 23, annexed hereto and made a part hereof.

34-b. The 23rd annual volume of the annual reports of The Associated Press contains a report of the remarks of the president of The Associated Press to the meeting of AP members in 1922 which reported remarks include the statements set forth in Exhibit No. 23.

[fol. 236] 35-a. In the year 1933 the application of the Craven Publishing Co., as owner of a newspaper known as the New Bern Tribune published in New Bern, North Carolina, for membership in The Associated Press was not granted by the Board of Directors of The Associated Press.

35-b. One of the reasons for the non-election of the Craven Publishing Co. by the Board of Directors was that The Associated Press member owning the New Bern Sun-Journal objected to its election.

35-c. The Craven Publishing Co. has never become a member of The Associated Press.

35-d. In the year 1933 the application of the Moundsville Journal Co., as owner of a newspaper known as the Moundsville Journal published in Moundsville, West Virginia, for membership in The Associated Press was not granted by the Board of Directors of The Associated Press.

35-e One of the reasons for the non-election of the Moundsville Journal Co. by the Board of Directors was that The Associated Press member owning the Moundsville Echo objected to its election.

35-f. The Moundsville Journal Co. has never become a member of The Associated Press.

35-g. In the year 1933 the application of The Vincennes Post, Inc., as owner of a newspaper known as the Vincennes Post to be published in Vincennes, Indiana, for membership in The Associated Press was not granted by the Board of Directors of The Associated Press.

35-h. One of the reasons for the non-election of The Vincennes Post, Inc., by the Board of Directors was that [fol. 237] The Associated Press member owning the Vincennes Sun-Commercial objected to its election.

35-i. The Vincennes Post, Inc., has never become a member of The Associated Press.

35-j. In the year 1934 the application of the Blackwell Tribune Publishing Co., as owner of a newspaper to be established at Ponca City, Oklahoma, under the name of Ponca City Tribune, for membership in The Associated Press was not granted by the Board of Directors of The Associated Press.

35-k. One of the reasons for the non-election of the Blackwell Tribune Publishing Co. by the Board of Directors was that The Associated Press member owning the Ponca City News objected to its election.

35-l. The Blackwell Tribune Publishing Co. has never become a member of The Associated Press.

35-m. In the year 1935 the application of the Athens Georgia Times & Georgian, as owner of a newspaper known as the Athens Times published in Athens, Georgia, for membership in The Associated Press was not granted by the Board of Directors of The Associated Press.

35-n. One of the reasons for the non-election of the Athens Georgia Times & Georgian by the Board of Directors was that The Associated Press member owning the Athens Banner Herald objected to its election.

35-o. The Athens Georgia Times & Georgian has never become a member of The Associated Press.

35-p. In the year 1935 the application of Wallace Stevens, as owner of a newspaper known as the Hollywood Sun, to be published as a daily in Hollywood, Florida, for membership [fol. 238] in The Associated Press was not granted by the Board of Directors of The Associated Press.

35-q. One of the reasons for the non-election of Wallace Stevens by the Board of Directors was that The Associated Press members owning the Miami Herald and Fort Lauderdale Daily News objected to his election.

35-r Wallace Stevens has never become a member of The Associated Press.

35-s. In the year 1935 the application of the Valley News Company, as owner of a newspaper known as the Portales Valley News published in Portales, New Mexico, for membership in The Associated Press was not granted by the Board of Directors of The Associated Press.

35-t. One of the reasons for the non-election of the Valley News Company by the Board of Directors was that The Associated Press member owning the Clovis Evening News Journal objected to its election.

35-u. The Valley News Company has never become a member of The Associated Press.

35-v. In the year 1935 the application of the Southwest Printing Company, as owner of a newspaper known as the Liberal Southwest Times published in Liberal, Kansas, for membership in The Associated Press was not granted by the Board of Directors of The Associated Press,

35-w. One of the reasons for the non-election of the Southwest Printing Company by the Board of Directors was [fol. 239] that The Associated Press member owning the Liberal News objected to its election.