

**Bari-Ellen Roberts Papers,**  
**1975-2002, n.d.**

**Creator:** Roberts, Bari-Ellen (1952- )

**Extent:** 10 linear feet.

**Processor:** Jeanelle Bergen, BVM, and Carole Heath. Updated by Elizabeth A. Myers, 2007.  
Updated by Beth Loch, 2011.

**Administration Information**

**Access Restrictions:** None

**Usage Restrictions:** Copyright was transferred to the Women and Leadership Archives.

**Preferred Citation:** Loyola University of Chicago. Women and Leadership Archives. Bari-Ellen Roberts Papers. Box #. Folder #.

**Provenance:** Bari-Ellen Roberts donated these materials to the Women and Leadership Archives in April 2003 (WLA2003.12).

**Separations:** Approximately 2 inches of material were removed and returned to Bari-Ellen Roberts. Approximately 1.5 linear feet of duplicate materials was removed.

**Biographical History**

In March of 1994, Bari-Ellen Roberts became the lead plaintiff in the largest class action discrimination suit in history. "I've never been afraid to compete with white people. I've been doing it since I was a child." These are the challenging words that introduce Bari-Ellen Roberts to the reader of her book, *Roberts vs. Texaco*. Her parents, Herman Roberts and Emma McElhaney had begun a slow upward climb into middle-class security in Cincinnati when she was born August 21, 1952, the fourth among six siblings. Her experience in race relations began early. As a pre-schooler, she reached out through a chain-link fence to a blond toddler who lived next door only to have the child's mother call her a "little nigger." Puzzled as to what this meant, she learned her first lesson about race when her mother explained the meaning of "nigger."

Bari-Ellen attended the predominantly black Burdett Elementary School. A school fire necessitated the temporary move of her sixth grade class to the modern, well-equipped, 'white' Linwood School; but once there the black students were not permitted the use of the regular facilities. Instead, they were located in an airless attic classroom, used the janitor's bathroom, ate lunch, not in the cafeteria, but at their classroom desks, and took their recesses inside. Again she puzzled over why being colored made such a difference to people.

Throughout her elementary schooling, her mentoring teachers had recognized her superior intellectual ability. As a result, they selected her to start her seventh grade at Walnut Hills, Cincinnati's elite public high school. With her excellent grade point average, having passed the admittance test, a few weeks before graduation she received word that she had been admitted to Walnut Hills.

It was at Walnut Hills when she became aware of civil rights and began to identify with personalities in the Black Militant Movement. As a leader in the Black Student Union, she

participated in a major demonstration within the school in which blacks protested racial incidents and white students reacted against the Vietnam War and the draft. Suspension did not follow this incident but it did after a later one. She had, however, completed her classes and had enough credits and enough scholarship aid to be admitted to Muskingum College in Ohio.

She left Muskingum at the semester and married Vence Lewis, whom she had known at Walnut High School and who was now a student at Duke University. After her first child was born, she returned to Muskingum for her sophomore year. A transfer to Xavier University in Cincinnati and a job as a carhop in a drive-in restaurant preceded her move to Dartmouth to be with her husband until he finished his degree. As an honors graduate, Vence was admitted to the prestigious First Scholars Program at the First National Bank of Chicago, a position that started him off at a good salary, provided challenging assignments for two years, and would pay for his business school education at either Northwestern or the University of Chicago.

When the family moved to Chicago in 1973, Bari-Ellen found a job with Prudential Insurance that had a tuition reimbursement program. She enrolled at Mundelein College in 1975; her second daughter was born in 1977. Bari-Ellen completed her degree requirements at Mundelein from which she was graduated in 1978. (Mundelein affiliated with Loyola University in 1991)

Her first employment was with Harris Bank, which she left after another racial incident. At Continental Bank she was able to attend the National Trust School at Northwestern University that led to her promotion to the position of Senior Trust Administrator. Meanwhile, her husband, having completed his MBA, was employed by IBM, which transferred him to White Plains, N.Y. thus necessitating another family move in 1980. Bari-Ellen's next job was with Chase Manhattan Bank where during her ten-year career she rose to be the first African- American Vice-President in the Corporate Trust Division.

By 1989, her marriage to Vence ended in divorce. The collapse of this relationship affected her work and her health. A strange illness, which totally robbed her of energy and caused frequent absences from her office, finally resulted in a leave of absence. This lasted a year during which a final diagnosis indicated a need for serious surgery. By the time she was ready to return to work, Chase's master trust department had been reorganized and its headquarters moved, making commuting inconceivable for Bari-Ellen.

It was at this point that Texaco with its multinational operation was suggested as a possible job option. In her work at Chase, Roberts had become acquainted with Texaco's inflexible attitudes but she was assured that Texaco was changing. It wanted diversity - performance not color. A series of frustrating interviews and correspondence ensued, resulting in her being offered two positions unsuitable for someone with her credentials. "All I wanted was a job that fit my experience and credentials, the kind they'd offer me if I were an ambitious white male, not an ambitious black woman. I just wanted to be treated equally." The struggle finally ended when she accepted a position as financial analyst at a salary of \$65,000, the first black woman to hold a professional position in Texaco's Finance Department.

Her reception proved a mutual culture shock, not only for Roberts but also for the engulfing white maleness of Texaco's professional employees. Shortly thereafter she learned that she and a fully

accredited, experienced African-American male in the Finance Department had been hired as 'Exhibits A and B' to prove to federal agencies that Texaco was really changing.

Despite instances of harassment, Roberts' grades on her professional review evaluation placed her within the group that could expect steady promotions. In a session with Texaco's chief financial officer, she had been informed that she was on the company's high potential list, people who were strong candidates for advancement.

With a few senior level black professionals, she was invited to a meeting with Texaco's vice-president of human resources to discuss the company's campaign for racial diversity. The group prepared themselves by studying the best affirmative action programs in use in corporate America. In the middle of their presentation, the vice-president exploded, calling them 'militant.' Accusing them of having Black Panthers running down the halls, he ended the meeting. At the time of her next annual review, she was informed that her work was excellent across the board and that undoubtedly she was in line for promotion. Within a few days she learned that her grades had been erased and changed to a lower grade because one executive had called her 'uppity.' She was not being punished for her work, but for her attitude, and her name had been removed from the 'high potential' list.

Learning that this was the usual treatment meted out to blacks in the employ of Texaco, it appeared possible that a class-action suit for racial discrimination might be initiated. Through the intervention of the Interfaith Center for Corporate Responsibility, the Texaco black contingent was introduced to a law firm that would take their case. Their lawsuit was served on Texaco on March 23, 1994.

There followed two years of deliberate delays on the part of Texaco. Finally, the tide turned in favor of the plaintiffs. In November of 1996, audio tapes surfaced containing dialogue among Texaco executives filled with racial remarks and plans to destroy or alter documents sought in evidence. With the release of these tapes, Texaco agreed to pay \$176 million dollars to approximately 1400 African-American employees across the country. Thus was settled the largest class action suit in history.

Texaco had also agreed on individual settlements with the two leading litigants who were still employed by the company. Roberts was guaranteed full salary for two years while she pursued studies for an executive MBA degree. It was at this time that she contracted to write a book. Texaco gave her the choice of writing the book or resigning from the company. She turned in her resignation in January of 1997 and in collaboration with Jack E. White, a national correspondent for *Time* magazine, produced the book *Roberts v. Texaco*. For a time, Ms. Roberts resided in Stamford, Connecticut, and was president of Bari-Ellen Roberts, Inc., a management-training firm focusing on diversity, sexual harassment, and violence in the workplace. At the time of this writing, she is residing in Litchfield Park, Arizona.

**Taken from *USA Today* (11/12/1996) and *New Haven Register* (11/16/1996)**

**Series 1: Personal, 1975-2002, n.d., Boxes 1-2**

This series contains Roberts personal materials not directly related to the suit. Materials include photographs, employment review performance and evaluations (not only from Texaco), personal correspondence, and material reflecting other employment endeavors such as speaking engagements following the settlement of the suit.

**Series 2: Law Suit, 1991-2001, n.d., Boxes 2-9**

This series contains materials related to the discrimination suit. The series is separated into parts reflecting different areas of the suit. There are general background materials in support of the discrimination suit as well as materials reflecting the suit outcome. Other materials include information on the Interfaith Center on Corporate Social Responsibility, professional profile of plaintiffs' attorneys, draft of the initial complaint, transcripts of the incendiary tapes, depositions, declarations and affidavits of plaintiffs' witnesses, reports of the Mediation meetings, and final report of the Independent Counsel.

**Series 3: Media Coverage, 1991-2001, n.d., Boxes 9-11**

This series contains materials related to media coverage of the trial. Mainly the material consists of newspaper articles and article transcripts covering the trial and aftermath. There are other materials including periodicals, requests for television interviews, and interviews with those involved in the suit.

**Series 4: Texaco, 1991-1998, n.d., Boxes 11-13**

This series contains materials related to the Texaco Corporation. Included are the Corporation's annual reports, employment review policies and programs, reports on African –American diversity employment and salary management, relations with EEOC, Texaco's reaction to the settlement of the Roberts suit, the formation of the Equality and Fairness Task Force, and a chronology of events in the Texaco litigation.

**Series 5: Book, 1997-1998, n.d., Boxes 13-16**

This series relates to all the phases involved in the development of the book, *Roberts vs. Texaco*, including the credentials of Jack White who collaborated with Roberts in the writing of the book, contractual agreements with Faith Childs Literary Agency and Avon Book Publishers, scope of the book as proposed by White, transcripts of tapes of principals, galley proofs, manuscript, book promotion, hard and paperback copies of *Roberts vs. Texaco*.

**Series 6: Other related corporate suits, 1994-1999, n.d. Box 17**

Included in this series are materials relating to discrimination law suits involving similar corporations: Shell Oil, Crown Petroleum, Sikorsky Aircraft, and Heublein, Inc. The final file in this series is a consultation on racial harassment cases involving the Seven-Up Company.

**Series 7: Audio-Visual Materials, 1996-1998, n.d., Boxes 18–20**

This audiotape collection centers predominantly on the recordings of Cyrus Mehri, counsel for the plaintiffs. Included are tapes of plaintiffs Bari-Ellen Roberts, Sil Chambers, and Mike Hausfeld as well as a member of the plaintiffs' counsel. This is an assorted collection of videocassettes, predominantly featuring the Texaco Corporation and executive Peter Bijur. Also included are

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several appearances of Roberts as guest author and plaintiff, NBC and CBS Press Conferences, and programs on ethnic and racial discrimination.

**Subjects:**

EEOC

Litigation Process

NAACP

Racial Discrimination

*Roberts v. Texaco*

Sexual Discrimination

Texaco Corporation

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<u>Box</u>	<u>Folder</u>	<u>Title</u>	<u>Dates</u>
<b>Series 1: Personal, 1975-2002, n.d.</b>			
1	1	Bari-Ellen Roberts Autobiography	1975
	2	Photos	1978, n.d.
	3	Chase Bank Performance Evaluation	1988
	4	Roberts' Journal of Racial Discrimination Case	1993-1996
	5	Robert's Performance and Development Review	1993
	6	Robert's Performance and Development Review	1994
	7	Robert's Performance and Development Review	1992-1994
	8	Handwritten notes	1994
	9	Walnut Hills High School Donor Book	n.d.
	10	Roberts' Plan for MBA	1996
	11	Roberts' Separation and Settlement Agreement with Texaco	1997
	12	Articles of Incorporation of Bari-Ellen Roberts, Inc.	1997
	13	Recognition Dinner – African American Friends	1997
	14	Invitation – Birthday and New House	1997
	15	Roberts – Social Security, Taxes, Correspondence	1998–2000
	16	Teaching: Corporate Social Responsibility Course taught at Fairfield University – Syllabus, Tests	2001
	17	Term Papers from Course	2001
	18	Program Corporation of America – List of Roberts' Media Appearances, Speaking Engagements, Awards	n.d.
	19	Roberts' Letter to Waldo's Mother after Mother's death	n.d.
	20	Roberts - Personal Correspondence	1992-1998
	21	National Black Chamber of Commerce	1996, 1998
	22	National Assn. Securities Professionals	1992, 1998
	23	NAACP Freedom Fund Dinner – Roberts speaker	1997
	24	NAACP Freedom Fund Dinner	1998
	25	Community Recognition Dinner	1997
	26	Black Career Women	1997
2	1	National Association of Black Journalists	1997
	2	Image Maker Awards	1997
	3	National Association of Negro Women, Inc. Awards Luncheon	1997
	4	The Links – Greater N.Y. Chapter – Luncheon	1997
	5	Support Network Materials	1998
	6	Journal of Blacks in Higher Education	1998
	7	Congressional Black Caucus – Tools for 2000	1998
	8	The Alliance of Black Telecommunications Employees	1998
	9	Connecticut Assn. Affirmative Action Professionals	1998
	10	Virginia Beach NAACP Freedom Fund Dinner	1998
	11	“Anger in the Workplace” – Beverly Goldberg	1999
	12	The Network Journals' Award Luncheon	1999
	13	Blacks in Government	1999

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14	Connecticut Assn. Affirmative Action Professionals	2000
15	Black Women's Task Force Conference	1999
16	George Crawford Awards Dinner	2001
17	Center for Culture and History of Black Diaspora at DePaul University: "Impact of Race, Gender and Class on Corporate America"	2000
18	Speech – "Dream Thieves" -Brown Eagle	2002
19	The New York League of Business Women	2001
20	Roanoke Valley Community Relations Conference	2001
21	Black Women's Task Force of Tucson	1999
22	Black Women's Leadership Council Conference	2000
23	Expo for Today's Black Woman	1999
24	African American Women in Business Conference	2001
25	Coalition of 100 Black Women	1999
26	Minority Business Leadership Conference	1999

**Series 2: Law Suit, 1991-2001, n.d.,**

	27	Firm Profile – Cohen, Milstein, Hausfeld, Toll	n.d.
	28	Expenditures Plaintiffs' Counsel	n.d.
3	1	Performance Ratings Statistics used in trial	1991-1993
	2	Roberts' Journal re: experiences at Texaco	1993-1996
	3	Robert's description of encounter with Jack Butler	1994
	4	Plaintiffs' proposal for programmatic changes in settlement	1994
	5	Texaco Discrimination memo	1994
	6	Texaco Discrimination	1994
	7	Texaco's request for documents	1995
	8	EEOC correspondence with Texaco	1995
	9	Letter to Class Action members from Attorney	1996
	10	Legal Correspondence	1995-1997
	11	Appendix 2: Chart comparing non-produced HRC Finance books with HRC produced finance books	n.d.
	12	Settlement Class - objections to attorney fees	1997
	13	(Bernstein, Litowitz, Berger & Grossmann, LLP)	n.d.
	14	Review – Outline of Settlement	n.d.
	15	Settlement Conference – PowerPoint Presentation	1997-2001
	16	Correspondence	1997-2001
	17	Correspondence – From Texaco executives, readers of the book, and cards	1996
	18	Letter to Roberts to support class suit	1996
	19	Interfaith Center on Corporate Social Responsibility	n.d.
	20	Global Corporate Responsibility	1996
	21	Correspondence and Transcripts of Tapes – Speakers identified by number	n.d.
4	1	Transcripts of Tapes	n.d.
	2	Transcripts of Tapes – Speakers identified by names	n.d.

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	3	Tape Transcripts and end notes	n.d.
	4	Preliminary Report of Dr. James Outtz in support of Plaintiffs’ Motion for Class Certification	n.d.
	5	Preliminary Report of Leonard Biermann in support of Plaintiffs’ motion for Class Certification	1993
	6	Civil Cause for Status Conference – Mediation Ground Rules	1994
	7	Charge of Discrimination with EEOC	1994
	8	Letter to SEC reviewing policies of EEOC	1994
	9	Draft of initial complaint	1994
	10	Nature of claim	1994
	11	Draft of complaint	1994
	12	Court documents	1994
	13	Plaintiffs’ first request for production of documents	1994
	14	Notice of right to sue for Sil Chambers	1994
	15	Notice of right to sue for Robert	1994
	16	Correspondence re: Litigation	1994
	17	Texaco’s objections and response to Plaintiffs’ first set of interrogatories	1994
	18	Litigation	1994-1997
	19	Texaco Discrimination Letter Brief Index	1994
	20	First Amended Complaint	1994
	21	Texaco’s memorandum in opposition to Plaintiffs’ motion to certify. a class	
	22	Correspondence re: Lundwall deposition	1994
	23	Plaintiffs’ second set of interrogatories to Defendant	1994
	24	Correspondence to BER and Sil Chambers from Cyrus Mehri	1994-1998
	25	Correspondence of Miguel Hernandez of Dept. of Justice re: suit	n.d.
	26	Continued deposition of Sil Chambers	1994
	27	Plaintiffs’ second request for production of documents	1994
5	1	Summary of Mediation Meeting	1994
	2	Plaintiffs’ request for production of documents	1994
	3	Mediation Ground Rules	1994
	4	Memorandum summarizing Mediation session	1994
	5	Schedule for Class discovery motion	1995
	6	Litigation	1994
	7	Litigation	1994
	8	Litigation	1994
	9	Letter from Texaco re: inappropriately obtained documents	1994
	10	Correspondence re: suit	1995-1997
	11	Legal documents	1995
	12	Plaintiffs’ second request for documents related to class certification	1995
	13	Plaintiffs’ object to first set of interrogatories	1995
	14	Response to motion schedule	1995
	15	Plaintiffs’ response to discovery schedule	1995
	16	Plaintiffs’ response to first set of interrogatories re: class issues	1995



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17	Re: privileged documents – Affirmative Action plans	1995
18	Objection to Plaintiffs’ Deposition notices	1995
19	Re: Discovery dispute – Definition of Texaco	1995
20	Re: Discovery improperly obtained Texaco documents	1995
21	Affidavit of John J. Howley	1995
22	Re: Agenda March 8 Conference	1995
23	Motion to quash subpoenas	1995
24	Plaintiffs’ objection to Texaco’s class discovery	1995
25	Discovery dispute – Star Enterprise	1995
26	Civil cause for Status conference	1995
27	Plaintiffs’ objection to Texaco’s discovery	1995
28	Plaintiffs’ motion to quash subpoenas	1995
29	Legal document – Civil cause for Status conference	1995
30	Plaintiffs’ response to Texaco’s motion to compel	1995
31	Plaintiffs’ response to Texaco’s “improperly obtained” documents	1995
32	Scope of non-party depositions	1995
33	Re: Plaintiffs’ privilege objections	1995
34	Preliminary report on Statistical Considerations re: class certification issues	1995
35	Supplement to preliminary report on Statistical Considerations re: class certification issues	1995
36	Plaintiffs’ memorandum of points/authorities in support of motion for class certification	1995
37	Notice of motion for class certification	1995
6	1 EEOC subpoena served on Plaintiffs	1995
	2 Declarations of Plaintiffs’ witnesses	1995
	3 Letter to Judge Mark Fox from EEOC re: protective order	1995
	4 Affidavit of John Howley re: Plaintiffs’ “improperly obtained” documents	1995
	5 Re: “Improperly obtained” documents	1995
	6 Confidentiality of documents	1995
	7 Expert Defense witness Charles Mann	1995
	8 Striking Texaco’s expert witness reports	1995
	9 Litigation	1995
	10 Litigation	1995
	11 Plaintiffs’ order to show cause why sanctions should not be imposed on Texaco	1996
	12 Affidavit of Bari-Ellen Roberts	1996
	13 Texaco statement to employees re: EEOC	1996
	14 Motion to renew motion for class certification	1996
	15 Motion for leave to amend	1996
	16 Second amended complaint	1996
	17 Hearing transcripts	1996
	18 Motion for class certification and amended complaint	1996
	19 Supplemental memorandum in support of Plaintiffs’ motion for	1996

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	class certification		
20	Plaintiffs efforts to obtain finance departments master book	1996	
21	Supplemental memo of law of plaintiff's motion for class certification	1996	
22	Memorandum of law in support of Plaintiffs' order to show cause why sanctions should not be imposed on Texaco	1996	
23	Order to show cause	1996	
7	1	Litigation	1996
	2	Memo regarding interim report of independent counsel	1996
	3	Letter to Judge Brieant regarding Roberts v. Texaco and EEOC	1996
	4	Escrow Agreement	1996
	5	Letter to Judge Brieant from US department of Labor regarding Roberts v. Texaco	1997
	6	Stipulation and Settlement Agreement	1997
	7	Letters of Appreciation regarding the suite	1997
	8	Notice of Pendency of Class Action - Proposed Settlement and Fairness Hearing	1997
	9	Plaintiff's Memorandum of Law of the proposed class action settlement	1997
	10	Motion for Leave to file memorandum Amicus Curiae in support of Settlement Agreement	1997
	11	Notice of Motion approval of proposed settlement application for award of attorney fees and reimbursement of expenses	1997
	12	Memorandum of Law in support of class counsel application for an award of attorney fees	1997
	13	Plaintiff's memorandum of law in support of named plaintiff's for incentive awards	1997
	14	Memorandum to approve terms and conditions of settlement	1997
	15	Plaintiff's submission in further support for the named plaintiffs for incentive awards	1997
	16	Order appointing special master	1997
	17	Judges Decree Settlement Instructions – Special Master Report Adoption	1997
	18	Affidavit of V. Shinault filed in support of plaintiffs application for incentive awards	1997
	19	Letter from Judge Brieant to Deval Patrick regarding chairing the task force	1997
	20	Report of Special Master pursuant to order of court	1997
	21	Special Master's report	1997
	22	Plaintiff vs. Shinault objection to special master's report and recommendation relating to her incentive report	1997
	23	Class member distribution fund letter	1997
	24	Roberts' deposition	1994
	25	Roberts' deposition	1994
	26	Manuscript of Sil Chambers' deposition	1994
	27	Deposition of Richard Lundwall	1994

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	28	Deposition of Pamela Gibson Akpotaire	1995
	29	Deposition of John Berry	1995
	30	Deposition of Katie Green Sampson	1995
	31	Deposition of Gretchen Olford	1995
	32	Deposition of Archie Wright, Sr.	1995
	33	Deposition of Linda Burnett	1995
8	1	Deposition of Beatrice Hester	1995
	2	Deposition of Victor Coleman	1995
	3	Deposition of Helen Marie Richards	1995
	4	Deposition of Ronnie Littlejohn	1995
	5	Deposition of Linda Gail Calhoun	1995
	6	Deposition of Jimmy Porter	1995
	7	Deposition of Veronica Shinault	1995
	8	Deposition of Michael Dejoie	1995
	9	Deposition of Steven Block	1995
	10	Deposition of Marcia Harris	1995
	11	Deposition of Peter Sherrill	1995
	12	Deposition of Trevor Samuel	1995
	13	Deposition of Larry J. Barnes	1995
	14	Deposition of Alfred Webb	1995
	15	Deposition of Marjorie Robinson	1995
	16	Deposition of Lisa Williams	1995
	17	Deposition of Richard Lundwall	1996
	18	Declaration of Paulette East	1995
	19	Declaration of Lisa Douglas	1995
	20	Declaration of Katie Green Sampson	1995
	21	Declaration of Johnny Berry	1995
	22	Declaration of Gretchen Olford	1995
	23	Declaration of Ellis Willis	1995
	24	Declaration of Yolanda Carrasco	1995
	25	Declaration of Victor Coleman	1995
	26	Declaration of Ronnie Littlejohn	1995
	27	Declaration of Eleanor Hunt	1995
	28	Declaration of Kevin Brooks	1995
	29	Declaration of Larry J. Barnes	1995
	30	Declaration of Helen Marie Richards	1995
	31	Declaration of Linda Burnette	1995
	32	Declaration of Linda Calhoun	1995
	33	Declaration of Stephen Wade Block	1995
	34	Declaration of Delouis Houston	1995
	35	Declaration of Donald Cheatham	1995
	36	Declaration of Michael Moccio	1995
	37	Declaration of Alfred Webb	1995
	38	Declaration of Peter Sherrill	1995
	39	Declaration of Trevor Samuel	1995
	40	Declaration of Lisa Williams	1995

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	41	Declaration of Jimmy Porter	1995
	42	Declaration of Marjorie Robinson	1995
	43	Declaration of Archie Wright, Sr.	1995
	44	Declaration of Patricia Akpotaire	n.d.
	45	Declaration of Lawrence Lorber	1997
	46	Affidavit of Edwin Giebel	1995
	47	Affidavit Cyrus Mehri re: Tapes	1996
9	1	Affidavit Cyrus Mehri – support of Plaintiffs’ motion for class certification	1995
	2	Affidavits of Daniel Berger and Michel Hausfeld	1997
	3	Affidavit of James Offutz	1997
	4	Affidavit of Stewart Schwab	1997
	5	Affidavit of Charles Mann, Ph.D.	1997
	6	Affidavit of Michael Rosenbaum	1997
	7	Affidavit of Jay Lichtman	1997
	8	Affidavit of Judith Goldfein	1997
	9	Affidavit of Daniel Coquillette	1997
	10	Affidavit of Leonard Biermann	1997
	11	Affidavit of Bari-Ellen Roberts - support of incentive awards	1997
	12	Affidavits of Gary Brouse and Lois Dauway	1994, 1995
	13	Affidavit of Bari-Ellen Roberts – support of incentive awards – (Incomplete)	n.d.
	14	Affidavit Janella Sue Martin	1994
	15	Final Report of Independent Counsel	1997
	16	Tape Transcripts and Endnotes discussed in Final Report of Independent Counsel	1997

**Series 3: Media Coverage, 1991-2001, n.d.,**

	17	Cyrus Mehri Interview - <i>Corporate Crime Reporter</i>	1994
	18	Request from Court TV to televise hearing	1996
	19	Affirmative Action in Leading Schools	1998
	20	Texaco – Vita: Members of Texaco Task Force	1997
	21	Lundwall article – <i>New York Times</i>	1997
	22	<i>The Final Call</i> – Million Women March	1997
	23	<i>Network</i> – IWWG Newsletter profiling Bari- Ellen Roberts	1997
	24	<i>The Nation</i> - Editorial re: Texaco	1996
	25	<i>Black Enterprise</i>	1994-1997
10	1	<i>Time</i>	1996, 1998
	2	<i>Essence</i> – Corporate Race Wars	1997
	3	<i>New York Times</i> – <i>Proquest</i>	1996-1997
	4	<i>Gannett News Service Focus</i> -_Story Synopses	1988-1997
	5	<i>Newsweek Magazine</i> – Race, Class, and Success	1994
	6	<i>The Corporate Examiner</i> – Interfaith Center on Corporate Responsibility	1994
	7	<i>Harper’s</i> – Women in Business	1998

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	8	<i>Fortune</i>	1998
	9	<i>Mosaic</i>	1998
	10	<i>Emerge</i>	2000
	11	<i>Working Woman</i>	1998, 2001
	12	<i>The American Lawyer</i>	1997
	13	<i>The Network Journal</i>	1999
	14	<i>Jet</i>	1997
	15	Roberts vs. Texaco	1994
	16	Roberts vs. Texaco – 1 of 3	1996
	17	Roberts vs. Texaco – 2 of 3	1996
	18	Roberts vs. Texaco – 3 of 3	1996
	19	Roberts vs. Texaco – 1 of 5	1997
	20	Roberts vs. Texaco – 2 of 5	1997
	21	Roberts vs. Texaco – 3 of 5	1997
	22	Roberts vs. Texaco – 4 of 5	1997
11	1	Roberts vs. Texaco – 5 of 5	1997
	2	Roberts vs. Texaco – 1 of 4	1998
	3	Roberts vs. Texaco – 2 of 4	1998
	4	Roberts vs. Texaco – 3 of 4	1998
	5	Roberts vs. Texaco – 4 of 4	1998
	6	Roberts vs. Texaco	1999 – 2000
	7	Newsclips outlining case	1997-1998
	8	Newsclips re: Minority Discrimination	1991, n.d.
	9	<i>In Touch</i> – African American Newspaper	1998
	10	<i>The Bull's Eye</i> – Nat. Assn. Securities Professionals	1997
	11	Abstract “The Future of Racism” – Caleb Rosada, Ph.D. (Incomplete)	1998
	12	Jesse Jackson and Texaco	n.d.
	13	Press conference	1998
	14	Texaco – <i>On Line News</i>	1994 – 96
	15	Request from CBS News to interview Cyrus Mehri	1997
	16	Request for interview by 60 Minutes	1996

**Series 4: Texaco, 1991-1998, n.d.**

	17	Texaco Information	1996- 1998
	18	Texaco Federal Contract Complaint – Conciliation Agreement	1994
	19	Finance Dept. Meeting Minutes	1993-1995
	20	Texaco Performance Management Program	1994
	21	Texaco Sensitivity Training	n.d.
	22	Texaco Job Posting Policy	n.d.
	23	Texaco Mentoring Program	n.d.
	24	Texaco High Potential Program	n.d.
	25	Ulrich – Human Potential Committee	1994
	26	Sil Chambers’ PMP Appeal	1993

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	27	Sil Chambers' PMP Appeal	1994
	28	Performance and Development Review Survey Results	1994
12	1	Texaco Human Resources Development Minutes	1993
	2	Texaco Correspondence	1994-1995
	3	Texaco Annual Report	1995
	4	Texaco Annual Report	1996
	5	Correspondence in support of Texaco	n.d.
	6	Texaco Baseline Diversity Assessment	1993
	7	Texaco African- American Employment Diversity	n.d.
	8	Texaco African American Salary Management	1994
	9	Results of OFCCP Audit	1994
	10	Finance Dept. Human Resources Meeting	1995-1996
	11	Finance Dept. Accomplishments	1991, n.d.
	12	Texaco and EEOC Affirmative Action Plan	n.d.
	13	EEOC Violations	1996
	14	Analysis of Texaco's Mismanagement	n.d.
	15	Texaco Press Release	1996
	16	Texaco Press Release	1996
	17	Letter to Texaco Employees from Richard Brenner, Human Resources	1996
	18	Letter from Peter Bijur to Employees	1996
	19	Statement re : Settlement by Peter Bijur	1996
	20	Press Release re: Texaco's Progressive Diversity Plan	1997
	21	Peter Bijur's Interview – one year later	1997
	22	Finance Department Newsletter: Summer	1992
	23	Texaco High Potential – 0-5 yrs, 6-10 yrs.	
	24	Handwritten notes on employees qualifications	1994
	25	HRD Restructuring Candidate Screening Team	1995
	26	Personnel Employee Profile	1996
	27	Finance Dept. Employee Ratings	n.d..
	28	Texaco: "Issues Raised and Lessons Learned"	n.d.
	29	Shareholders Derivative Securities Litigation	1997
	30	Texaco Shareholder Litigation	1997
	31	Equality and Tolerance Task Force – Statement of Objectives	n.d.
	32	Equality and Fairness Taskforce for 6 months ending	n.d.
	33	Annual Report of Equality and Fairness Task Force	1998
	34	Programmatic Relief Committee	1998
13	1	Lundwall resume – Correspondence re: support position	1996
	2	Lundwall Notice of Resignation	1996
	3	Summary of Lundwall interview with FBI	1996
	4	Lundwall/Ulrich Indictment	1997
	5	Statement on behalf of Robert Ulrich	1997
	6	US vs. Lundwall and Ulrich – Opposition to pre-trial motions	1997
	7	Prosecution motion re: Tapes	1997
	8	Plaintiffs in opposition to Defendant's pre-trial motion in Lundwall suit	1997

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9	BER Affirmation in Lundwall/Ulrich suit	1997
10	Multiple Motions in U.S. vs. Richard Lundwall	1997
11	J. David Keough vs. Texaco – liable for “K” involvement on Tapes	1998

**Series 5: Book, 1997-1998, n.d.**

12	Jack White: Credentials – Writing Samples	1997	
13	Collaboration Agreement: Bari-Ellen Roberts with Jack White	n.d.	
14	Faith Childs’ Literary Agency	1997	
15	Book contract Avon Books with Bari-Ellen Roberts	n.d.	
16	Book publication – Related materials – exchanges with publisher	1997	
17	Publisher’s Obligations	1997-1998	
18	Jack White – Scope of Book	n.d.	
19	Correspondence from Avon Editor	n.d.	
20	Manuscript pages	1997	
21	Press release Avon Books	n.d.	
22	Book Promotion	n.d.	
23	Book Cover	n.d.	
24	Request for liners for Book Cover	n.d.	
25	Book Listings/ Reviews	n.d.	
26	Faith Childs Literary Agency – Complimentary Copies	n.d.	
27	Faith Childs Literary Agency Forthcoming Projects	n.d.	
28	Correspondence re: Book	n.d.	
29	Texaco news clips for Jack White from <i>Time</i> Research Center	n.d.	
30	Correspondence from Texaco’s Attorney re: galley proofs of book	n.d.	
31	Peter Bijur’s decline for an interview with Jack White	1997	
32	Press Release: Avon Books acquisition of Book	1997	
33	Letter to Andrea Christensen re: her objections to her portrayal in book	1997	
34	Fan letters re: Book	1998	
35	Acknowledgements Page	1998	
36	Tape 2 – Side 1	1997	
37	Tape 1 – Side 2	1997	
38	Tape 2 – Sides 1 and 2	1997	
14	1	Tape 3 – Side 1	1997
	2	Tape 4 – Side 1	1997
	3	Tape 4 – Side 2	1997
	4	Tape 5 – Side 1	1997
	5	Tape 5 – Side 2	1997
	6	Tape 4 – Side 1	1997
	7	Tape 4 – Side 2	1997
	8	Tape 5 – Side 1	1997
	9	Tape 5 – Side 2	1997
	10	Tape 6 – Side 1	1997

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	11	Tape 7 – Side 1	1997
	12	Tape 7 – Side 2	1997
	13	Tape 8 – Side 1	1997
	14	Tape 9 – Side 1	1997
	15	Tape 9 – Side 2	1997
	16	Tape 10 – Side 1	1997
	17	Tape 4 – Side –1	1997
	18	Tape 4 – Side 2	1997
	19	Tape 1	1997
	20	Tape 2	1997
	21	Tape 3	1997
	22	Tape 4 – Side 1	1997
	23	Mediation - Tape 2 – Sides 1 and 2	1997
	24	Mediation - Tape 3 – Sides 1 and 2	1997
	25	Tape 1 – Sides 1 and 2	1997
	26	Tape 2 – Sides 1 and 2	1997
	27	Tape 1 – Sides 1 and 2	1997
	28	Tape 2	1997
	29	Tape 3	1997
	30	Tape 4	1997
15	1	Tape 5	n.d.
	2	Tape 7	n.d.
	3	Tape 8	n.d.
	4	Tape 9	n.d.
	5	Tape 10	1997
	6	Tape 11	1997
	7	Tape 12	1997
	8	Tape 1 – Sides 1 and 2 – re: Settlement	1997
	9	Tape 1 – Sides 1 and 2	1997
	10	Tape 2 – Sides 1 and 2	1997
	11	Tape 3 – Side 1	1997
	12	Tape 2 – Sides 1 and 2 – re: Tape	1997
	13	Tape 1 – Side 1 re: Recruiting	1997
	14	Tape 2 – Sides 1 and 2	1997
	15	Tape 2 – Sides 1 and 2	1997
	16	Tape 3 – Sides 1 and 2	1997
	17	Tape 4 – Sides 1 and 2	1997
	18	Tape 1 – Sides 1 and 2	1997
	19	Draft of Chapter 6	n.d.
	20	Draft of Chapters 1 to 10	n.d.
16	1	Early draft of Book	n.d.
	2	More complete copy of manuscript of Book	n.d.
	3	Galley Proofs of Book	n.d.
	4	Manuscript – pp. 1 – 74	n.d.
	5	Manuscript – pp. 76 –171	n.d.
	6	Manuscript – pp.172 – 259	n.d.



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7     *Roberts vs. Texaco* – Hard copy

**Series 6: Other related corporate suits, 1994-1999, n.d.**

17	1	Shell Oil Co. Law Suit Materials	1996
	2	Settlement of Similar Cases	n.d.
	3	Gardette vs. Heublein	n.d.
	4	Boycott of Crown Petroleum	1999
	5	Oregon Case Re: Discrimination	1995
	6	Discrimination Suit against Sikorsky Aircraft	1997
	7	Class Action Discrimination Suit against Sikorsky Aircraft	1997
	8	Letter with information of experience in pending class action suit	1998
	9	ARCO Notice of Annual Stockholders Meeting	1994
	10	Consultation on Racial Harassment Cases	1998

**Series 7: Audio-Visual Materials, 1995-1998, n.d.**

18	1	Chambers, Sil – Disc from Mystic Word	n.d.
	2	Chambers, Sil	1997
	3	Chambers, Sil	1997
	4	Chambers. Sil	1997
	5	Chambers, Sil	1997
	6	Hausfeld, Mike - #1	n.d.
	7	Hausfeld, Mike - #2	n.d.
	8	Mehri, Cyrus - #1	1997
	9	Mehri, Cyrus - #2	n.d.
	10	Mehri, Cyrus - #3	n.d.
	11	Mehri, Cyrus - #4	n.d.
	12	Mehri, Cyrus - #5	1997
	13	Mehri, Cyrus - #5	n.d.
	14	Mehri, Cyrus - #6	n.d.
	15	Mehri, Cyrus - \$8	n.d.
	16	Mehri, Cyrus - #9	1997
	17	Mehri, Cyrus - #10	n.d.
	18	Mehri, Cyrus - misc. I	n.d.
	19	Mehri, Cyrus - misc. II	n.d.
	20	Roberts, Bari-Ellen – Mediation - #1	n.d.
	21	Roberts, Bari-Ellen – Mediation - #3	n.d.
	22	Unidentified [Hans]	1997
	23	Unidentified [Drawl]	n.d.
19	1	<u>Texaco's Stockholders' Meeting – Rye, N.Y.</u>	1995
	2	<u>Black History Challenge – Texaco vs. NYNEX</u>	1995
	3	<u>Texaco Timeline</u>	1996
	4	<u>Texaco, Inc. – Jesse Jackson and Peter Bijur</u>	1996
	5	<u>Peter Bijur Interviews – Black Entertainment Television – Lead Story – CNN Late Edition with Frank Sesno</u>	1996

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	6	<u>Peter Bijur – Remarks to Westchester County Assn.</u>	1996
	7	<u>CBS Evening News – Black and White and Green</u>	1996
	8	<u>Texaco’s Plan – CNBC</u>	1996
	9	<u>CBS Evening News – Anti-Semitism</u>	1996
	10	<u>Roberts vs. Texaco – Bari-Ellen Roberts (Author) – Bloomberg Forum</u>	1998
20	1	<u>Book Signing</u>	1998
	2	<u>Betty Baye Show #11</u>	n.d.
	3	<u>Mom’s Show</u>	n.d.
	4	<u>Texaco Press Conference – NBC. ABC – I</u>	n.d.
	5	<u>Texaco Press Conference – NBC. ABC – II</u>	n.d.
	6	<u>Texaco Miscellaneous</u>	n.d.
	7	<u>Pueblo Bonito – Hotels and Resorts – Mazatlan – Los Cabos</u>	n.d.
	8	unidentified cassette I	n.d.
	9	unidentified cassette II	n.d.
	10	<u>Roberts vs. Texaco – TALK NEW YORK</u>	1998