

State of Maryland v. Louis Hyman:
Did Progressivism, Concern for
Public Health, and the Great
Baltimore Fire Influence the Court
of Appeals?

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Building Baltimore
Fall 2010

Introduction

In the latter half of the nineteenth century, increased immigration from eastern Europe and a growing garment industry in Baltimore led to vast growth in so-called sweatshops: cramped workspaces in which clothing was partially or completely sewn for market. As the sweatshops grew, integrated clothing factories were also emerging, finally becoming a real force in the Baltimore garment industry around the turn of the twentieth century. As the integrated factories grew, the workers joined in the growing organized labor movement, and then began to push for greater protections for the health and safety of workers, as well as fair wages. Among the most significant results of the organization of garment workers were the sweatshop laws passed in 1894, 1896, and 1902, which sought greater protection for the laborers in sweatshops, and through some of those protections, of the public health. The passage of these laws was achieved through efforts by both the garment workers unions, which sweatshop workers joined over this same stretch of time, and the state government officials who fought for the laws, namely Jacob Schonfarber, Assistant Chief of the Bureau of Industrial Statistics of Maryland. However, the enforcement regime enacted by the laws passed in the 1902 session of the Maryland General Assembly was viewed by many sweatshop operators as an undue intrusion upon private property rights and the right to work, and as providing authority to the inspectors without sufficient constraint upon their decision-making powers. Due to this challenge, the State pursued enforcement slowly at first, bringing test cases before the Court of Appeals to ensure that the law would be upheld as constitutional before beginning a real campaign of enforcement. The first test case, against garment contractor Morris Legum in 1902, resulted in a split 3-3 decision without a reported opinion, so the State pursued a second case against contractor Louis Hyman, and the 1904 Court of Appeals opinion in that case unanimously (7-0) upheld the law as constitutional. What forces were at play to lead the three judges who previously thought the law unconstitutional to change their minds?

Sweatshops and Integrated Factories

Sweatshops emerged in Baltimore in the last quarter of the nineteenth century, as Eastern European Jewish immigrants fleeing Tsarist oppression became a notable segment of the population of Baltimore.¹ The Russian immigrants brought with them the notion of manufacturing garments in distributed shops via a “task system.”² This meant that teams of workers worked in the living rooms of homes, usually rented, to produce project-based clothing or parts of garments in a piecework fashion.³ Wages were paid weekly, but depended on workers reaching their quotas; by setting quotas that were difficult or impossible to achieve, the contractors who operated such shops could avoid having to pay the full promised wages to their workers, keeping more of the profits of the enterprise for themselves.⁴



In order to keep overhead low, the contractors would cram as many workers as possible into each room, and neglect cleaning, lighting, and maintenance of the rooms.⁵ Among the primary issues were a lack of ventilation of the space, especially in

winter, a lack of daylight due to limited windows and closely crowded together buildings. Also contributing to the unhealthy environment were the use of coal for heat and gasoline (akin to white gas used in camp stoves) for cooking fuel and light in confined spaces, due to both the noxious fumes and the flammability risk.⁶

1 Kahn, Jr., Philip. *A Stitch in Time*. Baltimore: Maryland Historical Society. 1989. p. 74

2 Kahn p. 74

3 Kahn p. 74

4 Kahn p. 74.; Argersinger, Jo Ann E. "The City That Tries to Suit Everybody: Baltimore's Clothing Industry." *The Baltimore Book: New Views of Local History*. Philadelphia: Temple University Press. 1991. p. 83

5 Kahn at 101

6 Fox, Charles J. *Thirteenth Annual Report of the Bureau of Statistics and Information of Maryland*. Baltimore: Kohn & Pollock. 1905. p. 31-75; Image Source: Argersinger p. 83, Photo courtesy Baltimore Museum of Industry

The system took root primarily in rowhouses between the Jones' Falls in the East and Central Avenue in the West and from Monument Street South to the waterfront in Fell's Point.⁷ These immigrants rented houses in those neighborhoods because other Eastern European Jews had settled there, so there was a semblance of community and familiarity; they rented, rather than bought homes not only because they could not afford to buy, but also because of the fresh memories of being expelled from their homes in Europe.⁸ As individuals came over to establish themselves before bringing the rest of the family to the United States, they would frequently board with relatives or other members of their communities in Europe until they could afford their own space or to bring the family over, frequently sleeping in the kitchen and living room and working for the same contractor.⁹ This, of course, contributed to the overcrowding and lack of cleanliness in the sweatshops, but the system did allow families to work together, as men, women and children all worked together in the same space, albeit on different tasks and for different wages.¹⁰ Yet the crowded conditions, with between three and ten people working in each room, and the fact that some houses had as many as seven shops, two per floor plus one in the basement, meant that disease could spread easily through the workers.¹¹

As an indication of the way that the tenements were viewed at the time, Janet Kemp, in her 1907 report, *Housing Conditions In Baltimore*, referring to the tuberculosis death



⁷ Argersinger, p. 82

⁸ Kahn, p. 74

⁹ Kahn, p. 74

¹⁰ Kahn p. 75; Argersinger p. 83-84

¹¹ Kahn p. 101; Image Source: Kahn, p. 75. Bureau of Statistics, State of Maryland; provided to Kahn courtesy Baltimore Museum of Industry

statistics, wrote that, “we have no way of arriving at the number of those who die because their vitality has been lowered and their resistance to disease impaired by long exposure to the slowly destructive influence of insanitary surroundings...many of our workers are so housed that sunshine and pure air are practically unattainable.”¹² The areas which Kemp studied did not include the specific site of the sweatshop in this particular case, but some of them were part of the broader sweatshop districts.¹³ Illustrating similar concerns, Kemp wrote that, “it has been proven that, “density of population within the houses is much more nearly related to the death rate than the density of population on the acre.” It has also been found that “the death rate grows as the size of the apartment diminishes,” and that “there is likewise a close relation between the average number of persons per room and the death rate.””¹⁴ Clearly, then, prevailing sentiments among concerned citizens and the government, and the firmly held beliefs of social scientists of the era were that the conditions in which people lived in the tenement districts strongly facilitated the spread of infectious diseases, with the greatest threat being tuberculosis.

In the later years of the nineteenth century, Baltimore's garment industry began to shift into newly developed integrated factories, but the sweatshop system continued to be a significant component of the industry.¹⁵ The integrated factory approach grew in part because New York passed the Tenement



House Act in 1892, which discouraged sweatshops and encouraged production in factories, so

12 Kemp, Janet E. *Housing Conditions In Baltimore: Report of a Special Committee of the Association for the Improvement of the Condition of the Poor and the Charity Organization Society*. 1907. Reprint New York: Arno Press. 1974. p. 11

13 Kemp p. 12-13

14 Kemp p. 36 citing E.R.L. Gould, *Eighth Special Report of United States Commissioner of Labor*.

15 Kahn p. 77

Baltimore's garment industry had to follow suit or loses its ability to compete in the market.¹⁶ However, the rise of the integrated factory did not bring an end to the sweatshops, as the companies operating the factories used sweatshop contractors to maintain their profit margins in the tight market for garments.¹⁷ This use of sweatshops by integrated factories resulted in further oppressive conditions in the sweatshops, because the factories would use the lowest bidding contractor for the job, which resulted in lower wages for the sweatshop workers.¹⁸ Ultimately, though, only the rise of integrated factories and the resulting concentration of workers allowed the garment industry in Baltimore to organize into unions, as sweatshop workers were too overworked and not concentrated enough geographically to band together.¹⁹

The Sweatshop Laws

While the 1894 and 1896 laws made the act of operating a sweatshop under certain circumstances a crime, they did not provide any direct power for the State or its officers to inspect the sweatshops so as to enforce the laws. Early sweatshop inspections began in 1901, under the direction of Health Commissioner Bosley. Dr. B.A. Goodman and Inspector Charles Brodwater of the Health Department performed the inspection based on the 1894 law, but had no authority to demand entry, so their ability to better the lot of the workers was limited.²⁰ At about the same time, Jacob Schonfarber, an Assistant at the Bureau of Industrial Statistics visited 247 sweatshops to investigate the health and safety of the employees. The subsequent report issued by Thomas Smith, Chief of the Bureau of Industrial Statistics, contained a draft bill granting the inspection power, enforceable by fines or imprisonment, to the Chief of the Bureau of Industrial Statistics.²¹ The reasons cited in the report for concern about sweatshops and

¹⁶ Kahn p. 77

¹⁷ Kahn p. 78-9

¹⁸ Kahn p. 78-9

¹⁹ Argersinger p. 88; Image Source: Argersinger, p. 85. Photo courtesy Maryland Historical Society.

²⁰ To Inspect Sweatshops *The Sun* (1837-1985); Jun 15, 1901; ProQuest Historical Newspapers The Baltimore Sun (1837-1985)

²¹ The Sweatshop Evil *The Sun* (1837-1985); Sep 28, 1901; ProQuest Historical Newspapers The Baltimore Sun (1837-1985)

the need for an inspection regime were: the dirty conditions of the rooms; the likelihood of the spread of disease due to the cramped conditions, lack of ventilation, and aforementioned uncleanness; the dubiously lawful use of gasoline stoves in confined spaces; and the degree to which workers were being exploited by the contractors, who would sell the goods produced in the shops to larger manufacturers, and then claim to have received less money than anticipated for the goods, leading to lower wages for the workers.²² An Editorial in the Baltimore Sun elaborated on the Bureau of Industrial Statistics report, supporting the call for regular inspections under the theory that cleaning up the sweatshops was necessary to protect the public health.²³ After agitating for such a bill since 1886, Schonfarber finally saw a sweatshop bill with teeth become law in 1902. The 1894 and 1895 laws provided minimal power to the Health Department to regulate sweatshops, but the 1902 bill provided the power to inspect and enforce the laws to the Bureau of Industrial Statistics. The requirements for sweatshops to be allowed to operate under the 1894 and 1902 laws were:

- at least 400 cubic feet of air per person employed;
- the temperature shall “not habitually register more than 80 degrees” May 1 to October 1;
- rooms smaller than 500 square feet must be capable of being day-lit from 8 AM-4 PM;
- dirt or rubbish must be removed at least once every 24 hours;
- no person suffering from a contagious disease shall sleep or work in the workspace; and
- the shop must be pronounced healthful by some officer or board having the authority to pass upon its sanitary condition.²⁴

While working to find and appoint the sweatshop inspectors provided for in the 1902 law, the Bureau of Industrial Statistics requested that the Police Department do a survey of sweatshops; after the survey, the report showed, “that there [were] 1,655 manufacturing plants in Baltimore, exclusive of individual workers, tailors and sweatshops.”²⁵ Armiger and Weinberg were appointed to inspect

22 Smith, Thomas A. Tenth Annual Report of the Bureau of Industrial Statistics of Maryland. Baltimore: King Brothers, State Printers. 1902 p. 139-172

23 The Sweatshop Evil *The Sun* (1837-1985); Mar 8, 1902; ProQuest Historical Newspapers The Baltimore Sun (1837-1985)

24 New Sweatshop Law *The Sun* (1837-1985); Mar 30, 1902; ProQuest Historical Newspapers The Baltimore Sun (1837-1985)

25 Police Take Factory Census *The Sun* (1837-1985); Jun 27, 1902; ProQuest Historical Newspapers The Baltimore Sun

sweatshops by Thomas Smith, pursuant to the Sweatshop Laws of 1902 in June of that year.²⁶ Between July 1 and August 10, 1902, approximately 600 inspections were made; 300 permits to work were issued and 250 notices to change conditions were issued.²⁷

As these inspections proceeded, garment contractors sought advice from attorney Martin Lehmayer, who stated that, “[t]he law is very indefinite in its terms, and it is hard to say just what it means—whether it prohibits the occupation of the whole house by more than one family when there is a shop in it, or whether it applies merely to the room itself.”²⁸ This opinion encouraged the contractors to challenge the law through cases such as those of Morris Legum and Louis Hyman, discussed below. After the 1902 law was held unconstitutional in the Legum case, Thomas Smith, Chief of the Bureau of Industrial Statistics, stated that the law was intended to ensure consumers that the clothing manufactured in Baltimore was made, “under proper sanitary conditions,” and also to, “better the conditions of the people who are compelled to earn a livelihood in these sweatshops.”²⁹ At the same time as this challenge to the sweatshop law was proceeding, the Bureau of Industrial Statistics moved to new, larger offices in 1902, and changed into the Bureau of Statistics and Information. The Bureau had performed more than 2,000 inspections of places where clothing was manufactured, but took a break from the work after the 1902 law was held unconstitutional.³⁰

The Bureau of Statistics and Information's Eleventh Annual Report was issued in late March 1903, and described in greater detail than previously available the conditions in the sweatshops, especially the

(1837-1985)

26 To Inspect Workshops *The Sun* (1837-1985); Jun 28, 1902; ProQuest Historical Newspapers The Baltimore Sun (1837-1985)

27 Correcting Sweatshop Evil *The Sun* (1837-1985); Aug 10, 1902; ProQuest Historical Newspapers The Baltimore Sun (1837-1985)

28 Says Law Is Ambiguous *The Sun* (1837-1985); Aug 20, 1902; ProQuest Historical Newspapers The Baltimore Sun (1837-1985)

29 Mr. Smith on Sweatshops *The Sun* (1837-1985); Nov 19, 1902; ProQuest Historical Newspapers The Baltimore Sun (1837-1985)

30 Scope of Work Enlarged: Bureau Of Statistics And Information Has Been Active *The Sun* (1837-1985); Jan 2, 1903; ProQuest Historical Newspapers The Baltimore Sun (1837-1985)

circumstances then believed to facilitate the spread of infectious diseases.³¹ In the report, the Bureau's Chief, Thomas A. Smith stated,

“That the enforcement of the law as at present on the statute books would remedy very much of this evil, has been evidenced in the past six months, when changed conditions were brought about in many instances by the inspections and notices following. As a rule, the department did not find very strenuous objection to complying with the law from the people who realized its purposes, but a number of the contractors seemed to think that it was not only an interference with their rights, but that the expenses incident to renting other quarters, or moving their shops from their dwellings, was too great a hardship to be tamely submitted to.”³²

This belief on the part of some contractors would result in the challenges to the laws by Morris Legum and Louis Hyman, which provided a significant impediment to the State's agenda of trying to clean up, but not eliminate the sweatshops.

The Legum Case

The first warrant for violation of the sweatshop laws was sworn out by Jacob Schonfarber against contractor Morris Legum on August 27, 1902. The time limit on the warning issued to him by the Bureau of Industrial Statistics, one of 600 to 700 issued, had expired. Legum, a member of the Committee of Garment Contractors appointed to test the law, likely allowed his warning to expire in order to make a test case.³³ Morris Legum was arraigned and released on \$250 bail on August 28, 1902; he was charged with maintaining a shop in a tenement or dwelling occupied by the members of more than one family and failing to have enough airspace for each worker.³⁴ Legum was indicted on 6 charges; Judge Albert Ritchie, father of later Governor Ritchie, sustained the first charge, that Legum's workers did not have adequate air space under the 1894 law, but, sustaining Legum's demurrer to the other charges, held that the other five charges under the 1902 law were void, because that law was

31 How Wage Earners Live *The Sun* (1837-1985); Mar 31, 1903; ProQuest Historical Newspapers The Baltimore Sun (1837-1985)

32 Smith, Thomas A. Eleventh Annual Report of the Bureau of Statistics & Information of Maryland. Baltimore: The Sun Book and Job Printing Office. 1903 p. 56

33 Enforce “Sweatshop Laws” *The Sun* (1837-1985); Aug 28, 1902; ProQuest Historical Newspapers The Baltimore Sun (1837-1985)

34 First Sweatshop Case *The Sun* (1837-1985); Aug 29, 1902; ProQuest Historical Newspapers The Baltimore Sun (1837-1985)

unconstitutional in his view. As he wrote,

“I am constrained to hold that the provisions of this act so far considered are unreasonable, arbitrary and oppressive; the preservation of the public health does not demand them; they unlawfully interfere with the right of labor, with the right of the citizen 'to pursue unmolested a lawful employment in a lawful manner;' they unlawfully invade the privacy of the home, and, without due process of law, they deprive the citizen of the free and profitable use of his property and of his right to labor at any lawful work or occupation not injurious to others, when and where he will, and thus infringe upon his right of personal liberty.

Looking at the entire act, I think all its substantial provisions are so related to and dependent on each other that the Legislature had but one main object or system in view, and that without the provisions which are invalid the act would not have been passed.

I therefore am of opinion that the whole Act of 1902 is void, and will sustain the demurrer to all the counts founded upon it, overruling, on the concession of counsel, the demurrer to the first count, which is under the Act of 1894.”³⁵

Judge Ritchie's opinion that the 1902 law was unconstitutional was obviously a blow to the Bureau of Statistics and Information, but Chief Thomas Smith decided to appeal Judge Ritchie's decision on November 20, 1902, through Attorney-General Isidor Rayner. The Federation of Labor maintained State Senator Jacob Moses as counsel to assist the Attorney-General.³⁶ Judge Ritchie then issued a supplementary opinion in the Legum case on December 2, 1902.³⁷ The opinion clarified that a substantial portion of Judge Ritchie's concern centered around the fact that the 1902 laws did not contain specific standards which the inspectors were to use in evaluating the sanitary conditions (or lack thereof) in the clothing manufactories to be inspected. In discussing such standards, Judge Ritchie indicated that the state had argued that such standards were found in Section 149C, part of the 1894 Sweatshop Act, but that the 1902 law does not refer to that set of standards, much less require the inspections carried out under its authority to follow them in refusing to grant an operating permit to a particular shop. Furthermore, Judge Ritchie stated that the requirements under Section 149C, assuming

35 Sweatshop Law Void *The Sun* (1837-1985); Nov 18, 1902; ProQuest Historical Newspapers The Baltimore Sun (1837-1985)

36 Appeal in Sweatshop Case *The Sun* (1837-1985); Nov 21, 1902; ProQuest Historical Newspapers The Baltimore Sun (1837-1985)

37 A Second Sweatshop Opinion *The Sun* (1837-1985); Dec 3, 1902; ProQuest Historical Newspapers The Baltimore Sun (1837-1985)

arguendo that they are to be understood to be the requirements under the 1902 law, would fail to reach the range of sanitary conditions which were supposed to be problematic in the sweatshops. However, Judge Ritchie does not appear to have read the aforementioned requirements carefully, as he claimed that there was no requirement for lighting, though there was one.³⁸ Beyond that, though Judge Ritchie pointed out some flaws in the statutory scheme, the scheme indicated by his narrow reading of the statutes provided a sufficient basis for inspectors to issue permits or refuse to do so, as a substantial portion of the sweatshops were found problematic due to insufficient airspace for the workers, insufficient lighting, inappropriate temperatures, and workers carrying contagious disease, all of which were amply covered under Section 149C.³⁹

At trial on the first count of providing insufficient air space for his workers, Legum was convicted of the charge, but Judge Ritchie then struck the conviction to simplify the state's further proceeding to the Court of Appeals to determine the constitutionality of the 1902 law. Local attorney Myer Rosenbush, who would also later represent Louis Hyman, represented Legum at trial.⁴⁰ A group of sweatshop operators formed to cooperate in fighting the sweatshop law in the wake of Legum's prosecution. The Contractors' Protective Association hired Myer Rosenbush as its attorney.⁴¹

The State's appeal of the Legum case reached the Court of Appeals early in the summer of 1903. After hearing the Legum case, the Court of Appeals issued this opinion:

This being a criminal case and the traverser having been discharged by reason of the indictment having been quashed, and the cause having been argued before six judges of this court, who are equally divided on some of the questions raised as to the constitutionality of the Act of 1902, Chapter 101, the judgment quashing the indictment must be affirmed by a divided court, but without committing this court to the views and conclusions announced by the learned judge below, and this court distinctly reserving for further decision the constitutionality of the

38 Smith, Thomas A. Eleventh Annual Report of the Bureau of Statistics & Information of Maryland. Baltimore: The Sun Book and Job Printing Office. 1903 p. 102-105

39 Fox, Charles J. Thirteenth Annual Report of the Bureau of Statistics and Information of Maryland. Baltimore: Kohn & Pollock. 1905. p. 31-75

40 Under Sweatshop Law *The Sun* (1837-1985); Dec 12, 1902; ProQuest Historical Newspapers The Baltimore Sun (1837-1985)

41 To Fight Sweatshop Law *The Sun* (1837-1985); Jan 3, 1903; ProQuest Historical Newspapers The Baltimore Sun (1837-1985)

aforesaid statute when the question may arise in some other cause.⁴²

After the Court of Appeals split equally on the question of the constitutionality of the 1902 law in considering the Legum case because only six judges sat for the case, Schonfarber expressed belief that the laws would eventually held to be constitutional after a new test case was brought to the criminal court. The increased public awareness of the problem due to the Legum case and inspections under the 1902 law contributed significantly to Schonfarber's confidence.⁴³

Garment Workers and Unions

The labor movement in the garment industry in Baltimore got off to a slow start, but played a very important role in the fight against the sweatshop system. In 1883 in Philadelphia, the Journeyman Tailor's Union was formed, including a Baltimore local affiliate.⁴⁴ In 1891, the United Garment Workers of America was chartered in New York as an affiliate of the American Federation of Labor, and a Baltimore local followed soon thereafter.⁴⁵ The national United Garment Workers of America were fighting the sweatshop system by 1900.⁴⁶ It was around this same time that the general public in Baltimore began to pay attention to the problems of the sweatshop system.⁴⁷

The garment workers of Baltimore engaged in the time-honored tradition of going out on strike in 1889, 1892, 1894, and 1896.⁴⁸ These strikes, however, were more effective at drawing public attention to the sweatshop problem and encouraging legislative action than gaining any concessions from the owners of the factories.⁴⁹ The General Assembly passed laws in 1894 and 1896 in response to these

42 Smith, Thomas A. Twelfth Annual Report of the Bureau of Statistics and Information of Maryland. Baltimore: Wm. J. C. Dulany Co., State Printer. 1904. p. 65

43 Thinks Law Will Be Upheld *The Sun* (1837-1985); Jul 4, 1903; ProQuest Historical Newspapers The Baltimore Sun (1837-1985)

44 Kahn p. 78-9

45 Kahn p. 79-80

46 To Abolish Sweatshops *The Sun* (1837-1985); Aug 14, 1900; ProQuest Historical Newspapers The Baltimore Sun (1837-1985)

47 Kahn p. 101

48 Kahn p. 80

49 Argersinger p. 88

strikes which were, “loosely formed laws designed to eliminate health hazards, to set minimum wages and requirements for cleaning, lighting, and ventilating, and to establish minimum workroom sizes.”⁵⁰ Unfortunately for those employed in sweatshops, it was not until the passage of the 1902 law at issue in the case of *State of Maryland v. Louis Hyman* that government officials had the power to actually enforce these laws and protect the health and safety of workers.⁵¹ The umbrella organization of organized labor, the Baltimore Federation of Labor, lobbied in Annapolis for the passage of the sweatshop bill during the legislative session in the spring of 1902.⁵² This union action to limit the work done in sweatshops was a perfect example of workers combining their efforts to ensure higher standards for all workers, given the potential for use of contract sweatshops to lower standards of treatment and pay even for workers in integrated factories; though potentially self-serving, the workers in integrated factories were motivated to raise the level of working conditions throughout the industry.⁵³

Perhaps empowered by the recently passed 1902 laws, Local No. 114 of the Garment Workers of America, the Pants-Makers Union, went on strike in July 1902 to protest that the factories making use of their services were not providing the machines and other equipment they needed; 400 did not go to work in the morning, and more were summoned to strike over the course of the day.⁵⁴ Ultimately, 700 workers went out on strike, including about 200 women, between July 5 and July 26, though most of those striking went back to work sooner after the contractors for whom they worked agreed to pay for the sewing machines, irons, stoves, and ironing boards, and also to pay for days worked, rather than pieces produced.⁵⁵ This strike was among the first demonstrations of real organization among the sweatshop workers (as opposed to factory workers), furthered the cause of organizing the sweatshops,

⁵⁰ Kahn p. 80

⁵¹ Argersinger p. 86

⁵² Looking After Legislation *The Sun* (1837-1985); Mar 9, 1902; ProQuest Historical Newspapers The Baltimore Sun (1837-1985)

⁵³ Seidman, Joel. Labor in Twentieth Century America: The Needle Trades. New York: Farrar & Rinehart, Inc. 1942. p. 64.

⁵⁴ Pantsmakers Also Idle *The Sun* (1837-1985); Jul 8, 1902; ProQuest Historical Newspapers The Baltimore Sun (1837-1985)

⁵⁵ Smith, Thomas A. Eleventh Annual Report of the Bureau of Statistics & Information of Maryland. Baltimore: The Sun Book and Job Printing Office. 1903 p. 35-36

and clearly demonstrated the power that they had as a group to demand change.

As a further demonstration of the importance of the struggle of the sweatshop workers, the United Garment Workers Union hired State Senator Jacob Moses on September 3, 1902 to argue that the new sweatshop laws were constitutional in the cases challenging that notion⁵⁶ Taking this step indicated that the union was truly invested in the enforcement of the sweatshop laws, guaranteeing cleaner, better working conditions for their brother and sister garment workers in the sweatshops. The State had made it fairly clear that it would not begin full enforcement until the challenges to the constitutionality of the enforcement regime were resolved, so the union's decision to hire such a prominent figure indicated a sincere belief in the importance of the laws.

After the 1902 laws were declared unconstitutional in the proceedings of the Legum case (discussed below) in criminal court, the labor movement redoubled its efforts. The Baltimore Federation of Labor, the local affiliate of the American Federation of Labor, organized to counter Judge Ritchie's opinion that the 1902 laws were unconstitutional on November 19, 1902. At the same meeting, a letter from H.L. Eichelberger, Baltimore's representative to the national convention of the AFL in session at the time conveyed the message that he was working to bring the convention to Baltimore in 1903, which indicated that Baltimore's labor movement was strengthening.⁵⁷ Furthermore the Baltimore Federation of Labor's legislative committee met to discuss the sweatshop bill on November 25, 1902, and decided to throw as much of its resources as possible behind the appeal of Judge Ritchie's opinion, including possibly hiring other counsel to assist Senator Moses.⁵⁸

As the sweatshops were finally being cleaned up once the 1902 laws were ultimately upheld, the Sonneborn Company, one of the most prominent garment manufacturers, developed an open shop,

56 To Enforce Sweatshop Law *The Sun* (1837-1985); Sep 3, 1902; ProQuest Historical Newspapers The Baltimore Sun (1837-1985)

57 Federation May Meet Here *The Sun* (1837-1985); Nov 20, 1902; ProQuest Historical Newspapers The Baltimore Sun (1837-1985)

58 For the Sweatshop Law *The Sun* (1837-1985); Nov 26, 1902; ProQuest Historical Newspapers The Baltimore Sun (1837-1985)

allowed its workers to organize, and even developed a Court of Industrial Labor Relations to arbitrate labor disputes in his shop over the years.⁵⁹ Of note, Senator Moses, by then a Judge, was appointed by Sonneborn to be the eleventh member of the board of awards of this court, the only member who was not a representative of the laborers or management.⁶⁰

The Hyman Case

Louis Hyman and Isaac Plumack were released on \$100 bail each after being arraigned for violations of the 1902 sweatshop laws on July 21, 1903. Both had been notified of violations after inspections in the summer of 1902 and again in 1903 Hyman was operating a sweatshop in his home at 533 Aisquith Street, near the Old Town Mall.⁶¹ Hyman and Plumack were before Judge Henry Stockbridge, Jr. in Criminal Court on October 20, 1903.⁶² Following the opinion of his colleague, Judge Ritchie, Judge Stockbridge sustained the demurrers of both, as filed by Foutz & Norris (law partners who were also State Delegates) and Myer Rosenbush.⁶³ The new Attorney General, William Shepard Bryan, Jr., then appealed the case to the Court of Appeals. The Court of Appeals, in a unanimous opinion upheld the constitutionality of the 1902 laws and remanded Hyman's case for trial on February 19, 1904.⁶⁴ Three of the Judges of the Court of Appeals must then have changed their opinions as to the constitutionality of the 1902 sweatshop laws in the period of less than a year between considering the Legum case and the State's case against Louis Hyman. Just as with many other cases, the State made clear that it was not actually interested in convicting Hyman, but instead in cleaning up the sweatshops,

⁵⁹ Kahn p. 103

⁶⁰Labor Court Organized *The Sun* (1837-1985); Feb 15, 1916; ProQuest Historical Newspapers The Baltimore Sun (1837-1985)

⁶¹ To Test Sweatshop Law *The Sun* (1837-1985); Jul 22, 1903; ProQuest Historical Newspapers The Baltimore Sun (1837-1985)

⁶² Court Proceedings *The Sun* (1837-1985); Oct 20, 1903; ProQuest Historical Newspapers The Baltimore Sun (1837-1985)

⁶³ Sweatshop Cases Quashed *The Sun* (1837-1985); Oct 21, 1903; ProQuest Historical Newspapers The Baltimore Sun (1837-1985)

⁶⁴ Sweatshop Law Upheld *The Sun* (1837-1985); Feb 21, 1904; ProQuest Historical Newspapers The Baltimore Sun (1837-1985)

when the State entered a stet when it came up for trial in 1907, letting the matter go without trial.⁶⁵

The Opinion

After introducing the charges, Judge McSherry's opinion for a unanimous Court of Appeals turned immediately to the question presented by the case, “whether the Act under which the indictment was framed is a constitutional exercise of the legislative power of the General Assembly.”⁶⁶ Immediately, the opinion observed that, “the Act is ostensibly one intended for the preservation and the protection of the public health and safety,” and was, “incorporated in the Code under the subtitle 'Health'.”⁶⁷ In discussing the opinions of the Supreme Court of the United States concerning the police power of the states, McSherry stated, “it is not only the right, but the bounden and solemn duty of the State to advance the safety, happiness and prosperity of its people,” and that, “amongst [the State's] powers are inspection laws, quarantine laws, [and] health laws of every description.”⁶⁸ Cutting to the heart of the matter, the opinion cited the Supreme Court to the effect that, “if a statute purporting to have been enacted to protect the public health, the public morals or the public safety, has no real or substantial relation to those objects or is a palpable invasion of rights secured by the fundamental law, it is the duty of the Court to so adjudge and thereby give effect to the Constitution.”⁶⁹ Establishing the standard by which the Court would evaluate the laws of 1902, the Court stated, “if the Act has a real and substantial relation to the police power no inquiry as to its unreasonableness can arise, because it is the judgment of the law-makers and not of the Courts which must control; and if in the judgment of the former the thing be reasonable, all inquiry on that ground by the latter is foreclosed.”⁷⁰ Applying that test, the Court held that, “we find nothing in the Act of 1902 which indicates that its design, its purpose or its

65 BALTIMORE CITY CRIMINAL COURT (Criminal Docket) Indictment nos. 1267-1270, 1903 p. 212 [MSA C 1849-112, 3/30/3/29]

66 *State of Maryland v. Louis Hyman*, 57 A. 6, 7 (Md. 1904).

67 *Id.*

68 *Id.* at 8 (citing *City of New York v. Miln*, 11 Peters 102).

69 *Id.* at 9 (citing *Mugler v. Kansas*, 123 U.S. 623).

70 *Id.* at 10.

details have not a real and substantial relation to the police power.”⁷¹ However, the Court then indicated that there were limits to the State's power, stating, “it may be conceded that some of these provisions, if harshly administered may be or become oppressive, but it by no means follows that the law itself is therefore not a legitimate exercise of the police power.”⁷² After describing how the laws under which Louis Hyman was indicted were clearly targeted at protecting the public health, the Court held that, “the whole scheme of the Act appears to us to be in furtherance of the protection and preservation of the public health.”⁷³ Finally, answering the contention that the inspectors were granted too much authority, the Court stated that, “an officer, who, under pretext of executing the sweatshop statute, would assume to exert an arbitrary or unwarrantable power, would be answerable for his misconduct, just as would be any other trespasser.”⁷⁴ The Court then reversed Judge Stockbridge's opinion and remanded the case for trial.⁷⁵

After the *Hyman* Decision

A significant portion of the sweatshop section of the Thirteenth Annual Report of the Bureau of Statistics and Information consists of before and after pictures and descriptions of some of the sweatshops which the Bureau inspected after the Hyman case was decided in February. These descriptions and photographs make it absolutely clear that the intended result of the inspection regime was not to close down the entire sweatshop system, but rather to ensure the public health by keeping the shops from being breeding grounds for disease.⁷⁶ Of the 1,336 places (not all sweatshops) inspected, 1,013 permits to work were issued, 357 notices of violations were mailed, and only 45 operators were arrested and convicted of violations. This last number is certainly so low not because of

71 Id. at 10.

72 Id. at 10.

73 Id. at 11.

74 Id. at 12.

75 Id. at 12.

76 Fox, Charles J. Thirteenth Annual Report of the Bureau of Statistics and Information of Maryland. Baltimore: Kohn & Pollock. 1905. p. 31-75

a small number of violations, but because, “it was not until all other efforts to make these contractors obey the law had failed that warrants were sworn out for their arrest.”⁷⁷ In fact, “in several of the cases the State consented to a stet being entered because subsequent to the trial some of the parties had complied with the law by moving their families, cleaning up their shops, or in other ways remedying the bad conditions existing.”⁷⁸ Though there is no account of the economic impact upon these operators and the employees of the sweatshops, it seems that the government officials were content to issue permits to shops, provided that they maintained an environment which discouraged the transmission of diseases such as tuberculosis.

Potential Causes of the Changed Opinions

Given that the arguments made by the State in *State of Maryland v. Louis Hyman* were substantially the same as those it made against Morris Legum, there must have been some other factor that changed the minds of the Judges.⁷⁹ These are some of the possible factors in the changed decision.

Progressivism

As the sweatshop laws were being disputed, the reform-minded progressive movement was taking hold across the nation. Concern about the poor quality of life of those toiling in sweatshops was being expressed, and legislation to fight it sought on a national scale prior to 1900.⁸⁰ More locally, the Woman's Club of Roland Park organized a campaign to discourage the purchase of goods produced in sweatshops by “white-labelling” clothes produced outside of the sweatshop system in 1901.⁸¹ The Consumers' League of Maryland met on April 17, 1903 at Johns Hopkins University, and the principal address, delivered by the president of the National Consumers' League, was about the evils of the

⁷⁷ Fox, p. 46

⁷⁸ Fox, p. 46-47

⁷⁹ Eleventh Annual Report of the Bureau of Statistics and Information of Maryland. p. 115-128. and Twelfth Annual Report of the Bureau of Statistics and Information of Maryland. pp. 79-86.

⁸⁰Evils of the Sweatshop *The Sun* (1837-1985); Jan 18, 1897; ProQuest Historical Newspapers The Baltimore Sun (1837-1985)

⁸¹ Suburbs and County *The Sun* (1837-1985); Feb 11, 1901; ProQuest Historical Newspapers The Baltimore Sun (1837-1985)

sweatshop system.⁸² Basing his December, 1903 monthly sermon in the quote, “Am I my brother's keeper,” and the parable of the good Samaritan, Cardinal Gibbons strongly urged those in attendance at high mass at the Cathedral to work against the sweatshops, whether that be by public education, advocacy, or joining the Consumers' League in boycotting goods manufactured with sweatshop labor.⁸³ Among other achievements, Thomas Smith cited the improvements of the conditions in sweatshops due to inspections allowed by the 1902 law in a brief January, 1904 article expressing the importance of the recent expansions of the power and scope of the Bureau of Industrial Statistics and Information.⁸⁴ All of these occurrences were evidence of the progressive movement taking hold in Baltimore. It is possible that the progressive movement influenced the Judges on the Court of Appeals to change their minds and uphold the constitutionality of the 1902 laws, though it was probably at most a more minor influence, given that the Legum case was less than one year before the Hyman case, while the reforms of the progressives took place over much longer periods of time.

Public Health

Concern for the public health came along with the progressive movement and the increase in medical knowledge. Because the tenements, and especially the sweatshops therein, were so densely populated, they were a focus of public health concern, which was a significant motivator for the sweatshop laws.

The examples of prominent concern for the effects of the sweatshops on the public health made regular appearances in *The Sun* around the turn of the twentieth century. Two cases of diphtheria were reported in a sweatshop employing eleven people on High Street in 1899.⁸⁵ The requirements for air

82 Consumers League Meets *The Sun* (1837-1985); Apr 18, 1903; ProQuest Historical Newspapers The Baltimore Sun (1837-1985)

83 Wrong, Says Cardinal *The Sun* (1837-1985); Dec 7, 1903; ProQuest Historical Newspapers The Baltimore Sun (1837-1985)

84 Sweatshop Standard Raised *The Sun* (1837-1985); Jan 2, 1904; ProQuest Historical Newspapers The Baltimore Sun (1837-1985)

85 Painful Accidents *The Sun* (1837-1985); Sep 1, 1899; ProQuest Historical Newspapers The Baltimore Sun (1837-1985)

space in sweatshops in the 1894 law were clearly viewed as a progressive victory by Health Commissioner Jones, who raised it as an argument for better air circulation in schools in 1900.⁸⁶ Adelaide Dutcher at Johns Hopkins Medical School produced a comprehensive study of tuberculosis in 1900, and in that report she indicated that “Russians” were at the highest risk of becoming infected and carrying or spreading tuberculosis. The population which she described lived in, “a triangular area bounded by Monument Street, Central Avenue, and Jones' Falls,” which is precisely the section of the city where Louis Hyman lived and operated a sweatshop.⁸⁷ Health Commissioner Bosley used a case of scarlet fever in a sweatshop and the problems resulting therefrom for the sweatshop operator to argue for an infectious disease hospital.⁸⁸ Four months later, Dr. Bosley was questioned about a different sweatshop reported to be operating in a house with an infectious disease sign upon it, and expressed frustration that there was nothing the Health Department could do, because the lack of an infectious disease hospital meant that quarantine was the best way to combat disease, but there was at the same time no authority to stop the workers in the house, given that the government could not support the workers so prevented from working.⁸⁹

More directly indicating the government's attitude, the report of the Health Department for 1901 included maps, “showing the number and localities of all cases of typhoid fever, cases of scarlet fever and diphtheria, deaths from consumption, deaths from lobar pneumonia, cases of tetanus and of cow stables and sweatshops.”⁹⁰ By including the locations of sweatshops in parallel with cases of communicable diseases and the filth of cow stables, the Health Department strongly indicated that it

86 Foul Air in Schools *The Sun* (1837-1985); Jan 18, 1900; ProQuest Historical Newspapers The Baltimore Sun (1837-1985)

87 Where Death Hovers *The Sun* (1837-1985); Dec 4, 1900; ProQuest Historical Newspapers The Baltimore Sun (1837-1985)

88 Points Made By Dr. Bosley *The Sun* (1837-1985); Jul 12, 1902; ProQuest Historical Newspapers The Baltimore Sun (1837-1985)

89 Health Officers Hampered *The Sun* (1837-1985); Nov 28, 1902; ProQuest Historical Newspapers The Baltimore Sun (1837-1985)

90 Health Report in Print *The Sun* (1837-1985); Jun 1, 1902; ProQuest Historical Newspapers The Baltimore Sun (1837-1985)

saw sweatshops as a likely source of disease. In the Tenth Annual Report of the Bureau of Industrial Statistics, Chief Smith wrote, “no one now doubts that disease is often spread through the clothing manufactured in these “sweatshops,” nor does any one doubt that many of the “sweatshop” workers become impregnated with the germs of disease in the close and foul-smelling rooms, where men and women are huddled together, plying the needle and machine in an endeavor to keep body and soul together.”⁹¹ In the Eleventh Annual Report of the Bureau of Statistics and Information, Chief Thomas Smith wrote, “there is no better place to breed microbes of disease than in such surroundings.”⁹²

In 1902, the General Assembly appointed a State Tuberculosis Commission, which was to issue a report in early 1903. A prominent local doctor made remarks to the effect that the crowded, cramped, dark conditions in the sweatshops were a significant factor in the substantial increase in cases of tuberculosis. To bolster this statement, he indicated that experiments had been performed in which guinea pigs infected with tuberculosis and then placed in open air recovered, while guinea pigs so infected and placed in congested, dark, cramped spaces did not recover.⁹³ If there was any doubt as to the importance of the perceived threat of tuberculosis in the tenements and sweatshops, on the first page of the annual report of the Bureau of Statistics and Information for 1904 dealing with the sweatshop inspections, Chief Fox of that agency cited the report of the Tuberculosis Commission, which stated,

“The workshop is a very common means of spreading tuberculosis. By workshops, of course, is meant any inclosure in which one or more people are employed. Tuberculosis is an extremely chronic disease, and usually runs a long course even in its contagious stage before its victim is incapacitated for his usual occupation. Some people work with the contagious stage of tuberculosis for the greater part of a working lifetime, occasionally being thrown out of employment for a few weeks or months on account of an exacerbation, and again returning with as much vigor as before. Unfortunately, habits of men and women in the matter of spitting make

91 Smith, Thomas A. Tenth Annual Report of the Bureau of Industrial Statistics of Maryland. Baltimore: King Brothers, State Printers. 1902 p. 140

92 Smith, Thomas A. Eleventh Annual Report of the Bureau of Statistics and Information of Maryland. Baltimore: The Sun Book and Job Printing Office. 1903 p. 57

93 Will War on Consumption *The Sun* (1837-1985); Jan 25, 1903; ProQuest Historical Newspapers The Baltimore Sun (1837-1985)

it easy for a consumptive to contaminate his immediate environment in a shop, if not the entire shop...In a workshop in which a case of tuberculosis exists careful investigation will reveal the presence of other cases in various stages of the disease. Death will occur from such a shop at regular intervals for an indefinite period so long as the shop is permitted to remain contaminated.”⁹⁴

Though the science behind these understandings of the spread of tuberculosis and other diseases may be known to be false, it was certainly widely understood to be true at the time, so the community responded as if sweatshops actually threatened to broadly spread fatal diseases.

Perhaps most importantly for the case of *State of Maryland v. Louis Hyman*, a Tuberculosis Exhibition was held from January 25th to 31st, 1904 at Johns Hopkins University, including presentations by national and local experts on tuberculosis, and exhibits regarding the threat to Baltimore and the rest of Maryland from the disease. Of particular note, one of the committees created to prepare for the exhibition was the Factories, Tenements and Sweatshops Committee.⁹⁵ Based upon the findings shared at the exhibition, it was clear that, “overcrowding in dwellings, tenements, and institutions,” as well as poverty were conducive to the spread of tuberculosis, but Jewish people interestingly had a comparatively low mortality rate from the disease.⁹⁶ If the judges of the Court of Appeals attended the Exhibition, or even merely read about it or heard about it from others, perhaps the increased, focused attention on the disease-spreading characteristics of sweatshops convinced the judges that they were a real enough threat to the public that the 1902 sweatshop laws were justified and constitutionally acceptable because they were necessary to protect the public.

The Fire⁹⁷

Last, but certainly not least, the Great



94 Fox, Charles J. Thirteenth Annual Report of the
Pollock. 1905. p. 31-32.

95 Figure on White Death *The Sun* (1837-1985);
1985)

96 To Combat Consumption *The Sun* (1837-1985
(1837-1985)

Baltimore Fire of 1904 destroyed 70 blocks in the heart of Baltimore just twelve days before the Court issued its opinion, on February 7.⁹⁸ Overall, the fire burned 140 acres of downtown Baltimore.⁹⁹ The immensity of this destruction was shocking, and probably disconcerting to all Baltimoreans. Given the density of the tenement houses in the sweatshop district, the fact that those houses were older buildings like those that burned, and the fact that so many people were packed into a concentrated district heated in some cases by gasoline or coal stoves must naturally have led to concern that another fire might rip through the city. Logically, that concern might have swayed the Judges to uphold the constitutionality of the 1902 laws and allow the inspection regime to take effect in order to limit the possibility of such an event.

Economic Regulation and the Law

Obviously, the ways that the courts considered economic regulations similar to these sweatshop laws are also relevant. In Maryland, the Court of Appeals had not considered a case in which the State interfered with the working environment of people, but the 1899 case of *State of Maryland v. Henry A. Broadbelt* concerned regulations of the operations of dairies. In that case, the Court upheld regulations which were targeted at protecting the public health, much as the sweatshop laws, especially due to concern about transmission of tuberculosis.¹⁰⁰ The Supreme Court of the United States was about to consider and produce an opinion in *Lochner v. New York*, which remains one of the most controversial opinions of that body; the Court declared regulations on the working hours of bakers to be unconstitutional in part because the Court found that the stated public health rationale was unjustified in this case, but primarily because it impeded freedom of contract.¹⁰¹ However, the Supreme Court had

97 Image Source: unidentified panorama after the 1904 fire. Baltimore County Legacy Web. Baltimore County Public Library. Accessed at <http://external.bcpl.lib.md.us/hcdo/cfdocs/photopage.cfm?id=16415>

98 Thirteenth Annual Report of the Bureau of Statistics and Information of Maryland. p. 13.

99 Petersen, Peter B. The Great Baltimore Fire, 1904. In Maryland Online Encyclopedia at <http://www.mdoe.org/baltofire.html>

100 *State v. Broadbelt*, 43 A. 771 (Md. 1899).

101 *Lochner v. New York*, 198 U.S. 45 (1905)

previously upheld regulations of working hours in the mining industry because of the public safety issues and more severe health consequences upon miners¹⁰². The Court had also upheld regulation of grain elevators under the theory that some industries warrant closer regulation because of their “peculiar relation to the public interest,” such that the ability of the industry to effect the public is broader than usual, so the State is justified in regulating them.¹⁰³ Though the sweatshop laws in Maryland had some effects more similar to the regulation in question in *Lochner*, in that they limited the ways in which people could work, the purported public health rationale behind the sweatshop laws is more convincing, and so the ability of the state to regulate sweatshops was arguably more certainly justified under the police power of the State. The upholding of the laws by the Court of Appeals, then was on the forefront of increasing, but still constrained economic regulation by the State.

Conclusion

Though there is no certain answer to the question of why three Judges of the Maryland Court of Appeals changed their decision about the constitutionality of the sweatshop Act of 1902 between the summer of 1903 and February of 1904, but the growth of the influence of the progressive movement, increasing concern over the possible public health implications of the continued use of sweatshops, and the Baltimore fire of 1904 are all likely candidates. Especially given that the judges expressed sympathy with the concern that individual inspectors might act arbitrarily in individual cases, the judges must have believed that the cause of cleaning up the sweatshops was an important project for the State to be able to achieve. The ultimate result of the Court of Appeals upholding the constitutionality of the Act was, indeed, the continued inspection of sweatshops, resulting in relatively few prosecutions, but a significant reduction in the overcrowding, filthiness, and other perceived threats to the public from the sweatshops.

¹⁰²*Holden v. Hardy*, 169 U.S. 366 (1898)

¹⁰³*Budd v. New York*, 143 U.S. 517, 533 (1892)

The Players:
Judge Albert Ritchie

Judge Albert Ritchie was born September 7, 1834, in Frederick, Maryland. He attended Dickinson College in Carlisle, Pennsylvania, where he graduated in 1853. He then studied law under his brother, the Honorable John Ritchie, and at the University of Virginia, from which he graduated in 1856, and was admitted to the bar in Frederick. Two years later, he moved to Baltimore, where he continued to work as an attorney. He was a member of the Maryland Constitutional Convention of 1867. He then served as City Solicitor from 1872 to 1876, was the President of the Board of Supervisors of Elections for Baltimore City in 1880 and 1881, and then served as City Counsellor until he was elevated to the bench in 1892. He was the chairman of the Maryland delegation to the Democratic National Convention in 1886, at which Grover Cleveland was nominated to a second term as President. Outside of his official duties, he was the Senior Grand Warden of the Grand Lodge of Masons from 1882 to 1883, President of the Bar Association of Baltimore City in 1888, among the managers of the Female House of Refuge for many years, and in 1895 was appointed Professor of Mercantile Law at the University of Maryland School of Law, which post he held until his death.¹⁰⁴

Isidor Rayner

Isidor Rayner was born in 1850 in Baltimore City. After attending private schools and the University of Maryland at Baltimore, he graduated from the Law Department of the University of Virginia in 1869. He was admitted to the Maryland bar in 1871. He then served as a member of the Maryland House of Delegates from 1878 to 1884, as a State Senator in 1886 and 1888, and Attorney General of Maryland from 1889 to 1903. At the same time as he was serving the State, he was also elected as a Democrat to Congress, where he served from March 1887 to March of 1889, and then again from March of 1891 to March of 1895. He did not seek reelection at that time, but subsequently

¹⁰⁴Dennis, James, Editor. Report of the Ninth Annual Meeting of the Maryland State Bar Association. Baltimore: Hanzsche & Co. 1904.

was elected to the United States Senate, where he served from 1905 to 1912, in which year he passed away in Washington, DC.¹⁰⁵

Jacob M. Moses



JUDGE JACOB M. MOSES

Jacob Moses was born in Baltimore City on February 17, 1873. After attending Baltimore City public schools, he attended Johns Hopkins University, and upon graduating attended the University of Maryland School of Law. He was awarded top honors by the School of Law for his paper, “Law Applicable to Strikes,” which clearly indicated an interest in the labor movement and the accompanying unrest.¹⁰⁶ He was elected to the State Senate in 1899 as a Democrat from the First legislative district of Baltimore City to serve a four year term. His most significant legislative accomplishment was authoring a successful amendment to the state constitution expanding the representation of Baltimore City in the General Assembly. After returning to the practice of law once his term as a senator was over, he was appointed a Judge of the Juvenile Court of Baltimore City in 1908, though he resigned from that position in 1910, protesting the low wages accorded the person serving in that post. He was also heavily involved in the community, holding the positions of President of the Social Service Club; Director of United Hebrew Charities; chairman of the executive committee and of the committee on resolutions of the National Conference on the Education of Backward, Truant, Delinquent and Dependent Children; and member, committee on children of the National Conference of Charities and Correction.¹⁰⁷ He had also been a member of the Board of Governors and Counsel to

¹⁰⁵Maryland State Archives. Biographical Series. *MSA SC 3520-1512*. Accessed at <http://www.msa.md.gov/megafile/msa/speccol/sc3500/sc3520/001500/001512/html/1512bio.html> on November 20, 2010. Image Source: *A Monograph of the New Baltimore Courthouse*, 1899 (published by Frank D. Thomas)

¹⁰⁶Blum, Isidor. *The Jews of Baltimore: An Historical Summary of Their Progress and Status as Citizens of Baltimore from Early Days to the Year Nineteen Hundred and Ten*. Baltimore-Washington: Historical Review Publishing Company. 1910. p. 173; Image Source: Judge Moses to Quit *The Sun* (1837-1985); Jan 3, 1910; ProQuest Historical Newspapers The Baltimore Sun (1837-1985)

¹⁰⁷Judge Moses to Quit *The Sun* (1837-1985); Jan 3, 1910; ProQuest Historical Newspapers The Baltimore Sun (1837-1985)

the Old Town Merchants and Manufacturers' Association; one of the directors of and general counsel to the Central Business Men's Association; an active member of the Reform League; and a member of the Maryland Historical Society.¹⁰⁸ Perhaps the greatest honor bestowed upon Moses was being personally invited by President Theodore Roosevelt to participate in a conference in Washington, DC on destitute and neglected children.¹⁰⁹ After having been appointed to Sonneborn's Court of Industrial Labor Relations, he was also selected to be a member of a labor dispute resolution panel covering military uniform suppliers in service of the Federal government during World War I.¹¹⁰ He was also an activist on behalf of women, as he organized the first bureau for Contraceptive Advice, fought for woman suffrage, and sponsored the bill that allowed women to practice law in Maryland.¹¹¹ After serving as an attorney for Sun Life Insurance beginning in 1900, he accepted the position of General Counsel to that company in 1924 and served in that position until shortly before his death in 1968.¹¹²

Myer Rosenbush

Myer Rosenbush, born in 1868, appears to have merely been a local attorney with a significant enough reputation in the early 1900s to have caught the attention of the garment contractors, who hired him to forward the cause of having the 1902 sweatshop laws declared unconstitutional. He joined the Maryland State Bar Association in 1903. In November of that year, he wrote a letter to the editor of the Baltimore Sun supporting the candidacy of Attorney-General Isidor Rayner for the United States Senate.¹¹³ He was also the founder of the Maryland Yacht Club and President of the Maryland

¹⁰⁸Maryland Manual 1899. Baltimore: King Bros., State Printers. 1899. p. 220-221.

¹⁰⁹Judge Moses Invited *The Sun* (1837-1985); Dec 31, 1908; ProQuest Historical Newspapers The Baltimore Sun (1837-1985)

¹¹⁰Ex-Judge Moses Named *The Sun* (1837-1985); Oct 12, 1917; ProQuest Historical Newspapers The Baltimore Sun (1837-1985)

¹¹¹Hopkins Gives Jacob Moses 70th Homecoming Scroll *The Sun* (1837-1985); May 12, 1963; ProQuest Historical Newspapers The Baltimore Sun (1837-1985)

¹¹²Jacob M. Moses, Insurance Firm Attorney, Dies At 95 *The Sun* (1837-1985); Sep 20, 1968; ProQuest Historical Newspapers The Baltimore Sun (1837-1985)

¹¹³Mr. Rayner And Governor Smith. Myer Rosenbush. *The Sun* (1837-1985); Nov 20, 1903; ProQuest Historical Newspapers The Baltimore Sun (1837-1985)

Sportsmen's Luncheon Club. He passed away in August of 1936.¹¹⁴

Louis Hyman

Louis Hyman was born in Poland (or possibly Russia) in 1867, and immigrated to the U.S. in 1887. His wife Yetta (Jennie) immigrated two years later; they were probably married at the time, as their two eldest children were in Russia and probably immigrated with their mother. Louis' mother came to the U.S. in 1900 and lived with the family. Louis and Yetta had 9 children (8 who survived). She died sometime between 1930 and 1943. He died in January, 1943. The Census lists Hyman as a tailor (until 1930, when he was apparently retired). In 1900, he lived at 533 Aisquith; in 1910 he lived at 1216 McCullough; in 1920 and 1930 he lived at 2813 Hilldale Ave; in 1943, when he died, he lived at 3819 Norfolk Ave, just up the street from his son.¹¹⁵

Judge Henry Stockbridge, Jr.

Henry Stockbridge, Jr. was born in Baltimore in September, 1856. He attended Baltimore public schools, Dr. Eberling's School in Catonsville, Maryland, and Williston Academy in East Hampton, Massachusetts. He attended college at Amherst College, graduating in 1877 with a Bachelor of Arts, and then attended the University of Maryland School of Law, where he obtained his LL.B the following year. As he began to practice law, he also worked on the editorial staff of the *Baltimore American*. In 1882, he was appointed standing Examiner of Equity for the Baltimore courts. He was elected to the United States House of Representatives, representing the Fourth District in Baltimore City, the first Republican to represent Maryland after Reconstruction. In 1891, he was appointed Commissioner of Immigration, and resigned from that position in 1893. While in that position, he crafted a handbook on the Americanization of immigrants, which was later adopted almost verbatim by the United States

¹¹⁴Obituary. *The Sun* (1837-1985); Aug 29, 1936; ProQuest Historical Newspapers The Baltimore Sun (1837-1985)

¹¹⁵1900 U.S. Census. Maryland, Baltimore City, Ward 3; 1910 U.S. Census. Maryland, Baltimore City, Ward 5; 1920 U.S. Census. Maryland, Baltimore City, Ward 15; 1930 U.S. Census. Maryland, Baltimore City, Ward 15; BALTIMORE CITY HEALTH DEPARTMENT BUREAU OF VITAL STATISTICS (Death Record) Louis Hyman, 26 January 1943, Certificate no. G00414 [MSA CM1132-221, CR 48,264]. All as accessed and interpreted by Owen Laurie.

Department of Commerce. He first gained the title of Judge in 1896, when he was elected a member of the Supreme Bench of Baltimore City.

After the Great Baltimore Fire of 1904, Mayor McLane appointed him to the Citizen's Emergency Committee. He was appointed to the Court of Appeals as an Associate Judge in April of 1911, and elected to that position, which he held until his death, in November of that year. He also served as a member of the Commission on Uniform State Laws from 1912 until just before his death in 1924, having joined the Executive Committee in 1915 and serving as the President of the Commission from 1920 to 1922. He taught at the University of Maryland School of Law, and also served as a Regent and then Provost of the University, and then as the President of the Board of Trustees of the Endowment Fund. He also had a keen interest in history; he was a member of both the Maryland Historical Society and the American Historical Association, as well as the American Society of Colonial Wars, and served as Chancellor-General of the National Society of Colonial Wars and President of the Sons of the American Revolution.¹¹⁶ Perhaps most relevant to the sweatshop laws and the case of *State of Maryland v. Louis Hyman*, “his deep conservatism aroused the antagonisms of organized labor,” which indicates that he was not likely to find for the State, and therefore for the agenda of the unions.¹¹⁷

¹¹⁶Chesnut, W. Calvin. “Memorial of the Late Henry Stockbridge, Judge of the Court of Appeals of Maryland”. Report of the Twenty-Ninth Annual Meeting of the Maryland State Bar Association. MSBA 1924 Annapolis. p.61-4.

¹¹⁷Malone, Dumas, Editor. Dictionary of American Biography Vol. XVIII, Steward-Trowbridge. New York, Charles Scribner's Sons 1936. p. 36

Stanley A. Foutz

Stanley Foutz was born in 1874 in Baltimore. He graduated from Baltimore University School of Law with first honors in 1899*. He was elected in 1901 to the Maryland House of Delegates, representing the second legislative district of Baltimore City as a Republican.¹¹⁸ While serving as a Delegate, Foutz pushed for two significant bills. One would have kept the taxes in the most recently annexed section of the city low until the city fulfilled the promise of infrastructure improvements such as grading and paving of the streets, rather than allowing them to be raised per the City Charter.¹¹⁹ The other sought to have Baltimore purchase the streetcar system and operate it as a government function.¹²⁰ At some point, Foutz moved to Long Beach, California, where he died in August, 1963.¹²¹



William I. Norris

William I. Norris was born in Baltimore on July 18, 1880. After graduating from City College, he went on to study law at Baltimore University Law School*, where he graduated at 20, winning prizes for highest average and best thesis.¹²² In 1903, he was elected as a Delegate on the Democratic ticket for the first legislative district of Baltimore City, which post he held until he was elected to the State

* The Baltimore University School of Law merged with the University of Maryland School of Law in 1913. See the Minutes of the University of Maryland School of Law at <http://www.law.umaryland.edu/marshall/schoolarchives/documents/Minutes.pdf>

118 Maryland Manual 1901: A Compendium of Legal, Historical and Statistical Information Relating to the State of Maryland. Compiled by the Secretary of State. Baltimore: Wm. J. C. Dulany Co. 1901 p. 230

119 The Legislature: Special Dispatch to the Baltimore Sun The Sun (1837-1985); Jan 8, 1902; ProQuest Historical Newspapers The Baltimore Sun (1837-1985)

120 Municipal Ownership: Special Dispatch to the Baltimore Sun The Sun (1837-1985); Mar 6, 1902; ProQuest Historical Newspapers The Baltimore Sun (1837-1985)

121 Deaths The Sun (1837-1985); Aug 15, 1963; ProQuest Historical Newspapers The Baltimore Sun (1837-1985) Image Source: Advocates Annex Loan The Sun (1837-1985); Mar 17, 1905; ProQuest Historical Newspapers The Baltimore Sun (1837-1985)

* See Above.

122 Maryland Manual 1903. Compiled by Wilfred Bateman, Secretary of State. Baltimore: Wm. J. C. Dulany Co. 1903. and Former State Senator Dies The Sun (1837-1985); Oct 26, 1948; ProQuest Historical Newspapers The Baltimore Sun (1837-1985)

Senate for the same district in 1915¹²³. He served in the State Senate until 1923, and was President of the Senate from 1920 to 1922; he was a great aid to Governor Ritchie in getting administration bills passed in his time in the Senate.¹²⁴ In 1923, he was appointed Commissioner of Parks and Recreation.¹²⁵ In 1922, he ran for United States Senate on an anti-Prohibition platform, but withdrew from the primary election, and then in 1931 he ran for Mayor, but then withdrew in favor of Mayor Jackson. He then served as Mayor Jackson's executive secretary, and kept the position in the McKeldin administration.¹²⁶ He passed away in the fall of 1948.¹²⁷

William Shepard Bryan, Jr.

William Shepard Bryan, Jr. was born in December, 1859 in Baltimore. He attended Bethel Mill Academy from 1876 to 1879 and the University of Virginia from 1879 to 1880. He was admitted to the bar in 1882, and was appointed Counsel to the Board of Supervisors of Elections in Baltimore from 1890 to 1892. He then served as City Attorney and City Counsellor in 1892, City Solicitor from 1892 to 1895, and Attorney General from 1903 to 1907. He was a Democrat, and a member of the Maryland State Bar Association and the Bar Association of Baltimore City. He died in April, 1914.¹²⁸

Chief Judge James McSherry

James McSherry was born in Frederick, Maryland on December 30, 1842. He attended college at Mt. St. Mary's in Emmitsburg, then studied law under his father, and was admitted to the bar in 1864. He practiced law in his father's office until he was elected to the bench in November of 1887. He was

¹²³Mayland Manual 1903. Compiled by Wilfred Bateman, Secretary of State. Baltimore: Wm. J. C. Dulany Co. 1903.

¹²⁴Winchester, Paul. Men of Maryland Since the Civil War: Sketches of United States Senator Arthur Pue Gorman and His Contemporaries and Successors and Their Connection with Public Affairs. Vol. 1. Baltimore: Maryland County Press Syndicate 1923. pp. 222-24.

¹²⁵Norris Is Appointed Park Commissioner The Sun (1837-1985); Jan 28, 1923; ProQuest Historical Newspapers The Baltimore Sun (1837-1985)

¹²⁶Former State Senator Dies The Sun (1837-1985); Oct 26, 1948; ProQuest Historical Newspapers The Baltimore Sun (1837-1985) and Claims Prohibition is Principal Issue The Sun (1837-1985); Sep 1, 1922; ProQuest Historical Newspapers The Baltimore Sun (1837-1985)

¹²⁷Former State Senator Dies The Sun (1837-1985); Oct 26, 1948; ProQuest Historical Newspapers The Baltimore Sun (1837-1985)

¹²⁸Who Was Who In America v. 1 1897-1942. Chicago: The A.N. Marquis Company. 1943. p. 158.

appointed Chief Justice of the Court of Appeals by Governor Lowndes in January, 1896.¹²⁹ He was awarded an LL.D. by St. John's College in 1898 and another by the University of Maryland in 1907. He was a Southern sympathizer during the Civil War, and spent time in Federal prison, and was also the first President of the Maryland State Bar Association.¹³⁰

¹²⁹Sams, Conway W. and Elihu S. Riley. *The Bench and Bar of Maryland: A History 1634 to 1901*. Chicago: The Lewis Publishing Company. 1901. p. 542-549.

¹³⁰MSBA Report of 13th Annual Meeting Report of Committee on Legal Biography. Baltimore: Press of the Sun Job Printing Office. 1908. p. 76-81

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