# *Bari-Ellen Roberts Papers*
# *1975-2002*

**Creator:** Bari-Ellen Roberts **(**1952**- )**
**Extent:** 10 linear feet (20 boxes)
**Language:** English
**Repository:** Women and Leadership Archives, Loyola University Chicago. Please contact wlarchives@luc.edu regarding use.

## Administration Information

**Access Restrictions:** None

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

**Preferred Citation:** Identification of item, date, box #, folder #, Bari-Ellen Roberts Papers, Women and Leadership Archives, Loyola University Chicago.

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

**Processor:** Jeanelle Bergen, BVM, and Carole Heath. Updated by Elizabeth A. Myers, 2007; Beth Loch, 2011; (Biographical) C. L. Giannakopoulos (2020).

**Processing Information:** Finding aid updated December 2025.

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

## Biographical History

Bari-Ellen Roberts was born in Cincinnati on August 21, 1952 to parents Herman Roberts and Emma McElhaney. After completing her schooling, she moved to Chicago and later to the east coast. She worked in the banking industry for over 10 years and worked her way to becoming the first black Vice President in the Corporate Trust Division at Chase Manhattan Bank. Roberts faced significant racial discrimination while working as a senior financial analyst at Texaco, Inc. and became the lead plaintiff in a class action discrimination lawsuit. *Roberts vs. Texaco* gained national attention and resulted in a $176 million settlement, the largest settlement in a discrimination lawsuit at that time.

Roberts attended Burdett Elementary School and was selected by her elementary school teachers to attend Cincinnati's elite public high school, Walnut Hills. While attending Walnut Hills High School in the 1960s, Roberts became interested in the civil rights movement and joined fellow students to form a black students' union. In her junior year, Roberts helped plan a demonstration in which black students and white students came together to protest problems in the school and the world, including racial discrimination, the Vietnam War, and the draft.

Roberts began her college education at Muskingum College in Ohio. In her first year, she married Vence Lewis, a classmate from high school who was now a student at Dartmouth College. After giving birth to her first child, Roberts transferred to Xavier University in Cincinnati before deciding to put her education on hold to focus on her family.

The family moved to Chicago in 1973, where Roberts found a job with Prudential Insurance. Taking advantage of her employer's tuition reimbursement program, Roberts enrolled in Mundelein College's Weekend College in 1975. The continuing education program allowed her to focus on her full-time job and family during the week and take courses on the weekends. After the birth of her second child in 1977, Roberts decided to quit her job and commit to completing her degree. She fulfilled her dream when she graduated with honors from Mundelein College in 1978 with a degree in business management. Mundelein College affiliated with Loyola University Chicago in 1991.

After graduating, Roberts accepted a position at Harris Bank where she discovered her dream of managing master trusts, funds that invest in pension plans for large corporations. She later got a job at Continental Bank and attended the National Trust School at Northwestern University, which led to a promotion to Senior Trust Administrator. In 1980, the family moved to Stamford, Connecticut, and Roberts began a job at Chase Manhattan Bank in New York. During her ten years at the bank, she rose to be the first black Vice-President in the Corporate Trust Division.

In 1989, Roberts and her husband divorced, and she took a leave of absence due to a debilitating illness. Following her recovery, Roberts searched for a new job that was closer to her home.

At the suggestion of a friend, Roberts interviewed for a job at Texaco, Inc., despite misgivings about the corporation's workplace culture. After turning down offers from Texaco for positions she thought did not match her credentials, Roberts accepted a position as a senior financial analyst, becoming the first black woman to hold a professional position in Texaco's Finance Department.

Denied an expected promotion despite high marks on her performance review, Roberts began to talk to other black employees at Texaco. She found patterns of discrimination throughout the company.

Roberts and other Texaco employees realized that a class-action lawsuit for racial discrimination could be initiated. Through the support of the Interfaith Center for Corporate Responsibility, the Texaco workers were introduced to a law firm that would take their case. Their lawsuit was served on Texaco on March 23, 1994, with Roberts and her coworker Sil Chambers named as 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 black employees across the country, the largest race-discrimination settlement in history at that time.

Roberts, who had continued to work at the company, resigned from her position at Texaco in 1997 with plans to write a book about her experiences. In collaboration with Jack E. White, a national correspondent for *Time* magazine, she produced the book *Roberts v. Texaco: A True Story of Race and Corporate America*.

Following the settlement, Roberts shared her experiences through speaking engagements and served as the chair of the African American Association for Corporate Responsibility. She started her own company, Bari-Ellen Roberts, Inc., a management-training firm focusing on diversity, sexual harassment, and violence in the workplace. She was also an adjunct professor at Fairfield University from 1999-2002. The American Association of University Women Legal Advocacy Fund awarded Roberts its Speaking Out for Justice Award in 2003.

## Scope and Content

This collection spans the years 1975-2002 with the majority of the materials pertaining to the Texaco lawsuit.

**Series 1: Personal, 1975-2002, undated, 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**: **Lawsuit, 1991-2001, undated, 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 outcome of the suit. 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, undated, 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, undated, 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, undated, 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 only contains transcripts of tapes; no AV items are in these boxes.

**Series 6**: **Other related corporate suits, 1994-1999, undated, Box 17**
Included in this series are materials relating to discrimination lawsuits 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**: **Audiovisual Materials, 1996-1998, undated, Boxes 18-20**
This series includes audiocassettes, VHS tapes, and a floppy disk. The audiocassettes center 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. The assortment of videocassettes (VHS) predominantly features the Texaco Corporation and executive Peter Bijur. Also included are 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, Bari-Ellen (1952-)
*Roberts v. Texaco*
Sexual Discrimination
Texaco Corporation

| Box | Folder | Title | Dates |
|---|---|---|---|
| | | ***Bari-Ellen Roberts Papers 1975-2002*** | |
| | | **Series 1: Personal, 1975-2002, undated** | |
| 1 | 1 | Bari-Ellen Roberts Autobiography | 1975 |
| 1 | 2 | Photos | 1978, undated |
| 1 | 3 | Chase Bank Performance Evaluation | 1988 |
| 1 | 4 | Roberts' Journal of Racial Discrimination Case | 1993-1996 |
| 1 | 5 | Robert's Performance and Development Review | 1993 |
| 1 | 6 | Robert's Performance and Development Review | 1994 |
| 1 | 7 | Robert's Performance and Development Review | 1992-1994 |
| 1 | 8 | Handwritten notes | 1994 |
| 1 | 9 | Walnut Hills High School Donor Book | undated |
| 1 | 10 | Roberts' Plan for MBA | 1996 |
| 1 | 11 | Roberts' Separation and Settlement Agreement with Texaco | 1997 |
| 1 | 12 | Articles of Incorporation of Bari-Ellen Roberts, Inc. | 1997 |
| 1 | 13 | Recognition Dinner – African American Friends | 1997 |
| 1 | 14 | Invitation – Birthday and New House | 1997 |

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|---|---|---|---|
| 1 | 15 | Roberts – Social Security, Taxes, Correspondence | 1998–2000 |
| 1 | 16 | Teaching: Corporate Social Responsibility Course taught at Fairfield University – Syllabus, Tests | 2001 |
| 1 | 17 | Term Papers from Course | 2001 |
| 1 | 18 | Program Corporation of America – List of Roberts' Media Appearances, Speaking Engagements, Awards | undated |
| 1 | 19 | Roberts' Letter to Waldo's Mother after Mother's death | undated |
| 1 | 20 | Roberts - Personal Correspondence | 1992-1998 |
| 1 | 21 | National Black Chamber of Commerce | 1996, 1998 |
| 1 | 22 | National Assn. Securities Professionals | 1992, 1998 |
| 1 | 23 | NAACP Freedom Fund Dinner – Roberts speaker | 1997 |
| 1 | 24 | NAACP Freedom Fund Dinner | 1998 |
| 1 | 25 | Community Recognition Dinner | 1997 |
| 1 | 26 | Black Career Women | 1997 |
| 2 | 1 | National Association of Black Journalists | 1997 |
| 2 | 2 | Image Maker Awards | 1997 |
| 2 | 3 | National Association of Negro Women, Inc. Awards Luncheon | 1997 |
| 2 | 4 | The Links – Greater N.Y. Chapter – Luncheon | 1997 |
| 2 | 5 | Support Network Materials | 1998 |
| 2 | 6 | Journal of Blacks in Higher Education | 1998 |
| 2 | 7 | Congressional Black Caucus – Tools for 2000 | 1998 |
| 2 | 8 | The Alliance of Black Telecommunications Employees | 1998 |
| 2 | 9 | Connecticut Assn. Affirmative Action Professionals | 1998 |
| 2 | 10 | Virginia Beach NAACP Freedom Fund Dinner | 1998 |
| 2 | 11 | "Anger in the Workplace" – Beverly Goldberg | 1999 |
| 2 | 12 | The Network Journals' Award Luncheon | 1999 |
| 2 | 13 | Blacks in Government | 1999 |
| 2 | 14 | Connecticut Assn. Affirmative Action Professionals | 2000 |
| 2 | 15 | Black Women's Task Force Conference | 1999 |
| 2 | 16 | George Crawford Awards Dinner | 2001 |
| 2 | 17 | Center for Culture and History of Black Diaspora at DePaul University: "Impact of Race, Gender and Class on Corporate America" | 2000 |
| 2 | 18 | Speech – "Dream Thieves" -Brown Eagle | 2002 |
| 2 | 19 | The New York League of Business Women | 2001 |
| 2 | 20 | Roanoke Valley Community Relations Conference | 2001 |
| 2 | 21 | Black Women's Task Force of Tucson | 1999 |
| 2 | 22 | Black Women's Leadership Council Conference | 2000 |
| 2 | 23 | Expo for Today's Black Woman | 1999 |
| 2 | 24 | African American Women in Business Conference | 2001 |
| 2 | 25 | Coalition of 100 Black Women | 1999 |
| 2 | 26 | Minority Business Leadership Conference | 1999 |
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| | | **Series 2**: **Lawsuit, 1991-2001, undated** | |
|---|---|---|---|
| 2 | 27 | Firm Profile – Cohen, Milstein, Hausfeld, Toll | undated |
| 2 | 28 | Expenditures Plaintiffs' Counsel | undated |
| 3 | 1 | Performance Ratings Statistics used in trial | 1991-1993 |
| 3 | 2 | Roberts' Journal re: experiences at Texaco | 1993-1996 |
| 3 | 3 | Robert's description of encounter with Jack Butler | 1994 |
| 3 | 4 | Plaintiffs' proposal for programmatic changes in settlement | 1994 |
| 3 | 5 | Texaco Discrimination memo | 1994 |
| 3 | 6 | Texaco Discrimination | 1994 |
| 3 | 7 | Texaco's request for documents | 1995 |
| 3 | 8 | EEOC correspondence with Texaco | 1995 |
| 3 | 9 | Letter to Class Action members from Attorney | 1996 |
| 3 | 10 | Legal Correspondence | 1995-1997 |
| 3 | 11 | Appendix 2: Chart comparing non-produced HRC Finance books with HRC produced finance books | undated |
| 3 | 12 | Settlement Class - objections to attorney fees | 1997 |
| 3 | 13 | (Bernstein, Litowitz, Berger & Grossmann, LLP) | undated |
| 3 | 14 | Review – Outline of Settlement | undated |
| 3 | 15 | Settlement Conference – PowerPoint Presentation | 1997-2001 |
| 3 | 16 | Correspondence | 1997-2001 |
| 3 | 17 | Correspondence – From Texaco executives, readers of the book, and cards | 1996 |
| 3 | 18 | Letter to Roberts to support class suit | 1996 |
| 3 | 19 | Interfaith Center on Corporate Social Responsibility | undated |
| 3 | 20 | Global Corporate Responsibility | 1996 |
| 3 | 21 | Correspondence and Transcripts of Tapes – Speakers identified by number | undated |
| 4 | 1 | Transcripts of Tapes | undated |
| 4 | 2 | Transcripts of Tapes – Speakers identified by names | undated |
| 4 | 3 | Tape Transcripts and end notes | undated |
| 4 | 4 | Preliminary Report of Dr. James Outtz in support of Plaintiffs' Motion for Class Certification | undated |
| 4 | 5 | Preliminary Report of Leonard Biermann in support of Plaintiffs' motion for Class Certification | 1993 |
| 4 | 6 | Civil Cause for Status Conference – Mediation Ground Rules | 1994 |
| 4 | 7 | Charge of Discrimination with EEOC | 1994 |
| 4 | 8 | Letter to SEC reviewing policies of EEOC | 1994 |
| 4 | 9 | Draft of initial complaint | 1994 |
| 4 | 10 | Nature of claim | 1994 |
| 4 | 11 | Draft of complaint | 1994 |
| 4 | 12 | Court documents | 1994 |
| 4 | 13 | Plaintiffs' first request for production of documents | 1994 |
| 4 | 14 | Notice of right to sue for Sil Chambers | 1994 |
| 4 | 15 | Notice of right to sue for Robert | 1994 |

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| 4 | 16 | Correspondence re: Litigation | 1994 |
| 4 | 17 | Texaco's objections and response to Plaintiffs' first set of interrogatories | 1994 |
| 4 | 18 | Litigation | 1994-1997 |
| 4 | 19 | Texaco Discrimination Letter Brief Index | 1994 |
| 4 | 20 | First Amended Complaint | 1994 |
| 4 | 21 | Texaco's memorandum in opposition to Plaintiffs' motion to certify. a class | |
| 4 | 22 | Correspondence re: Lundwall deposition | 1994 |
| 4 | 23 | Plaintiffs' second set of interrogatories to Defendant | 1994 |
| 4 | 24 | Correspondence to BER and Sil Chambers from Cyrus Mehri | 1994-1998 |
| 4 | 25 | Correspondence of Miguel Hernandez of Dept. of Justice re: suit | undated |
| 4 | 26 | Continued deposition of Sil Chambers | 1994 |
| 4 | 27 | Plaintiffs' second request for production of documents | 1994 |
| 5 | 1 | Summary of Mediation Meeting | 1994 |
| 5 | 2 | Plaintiffs' request for production of documents | 1994 |
| 5 | 3 | Mediation Ground Rules | 1994 |
| 5 | 4 | Memorandum summarizing Mediation session | 1994 |
| 5 | 5 | Schedule for Class discovery motion | 1995 |
| 5 | 6 | Litigation | 1994 |
| 5 | 7 | Litigation | 1994 |
| 5 | 8 | Litigation | 1994 |
| 5 | 9 | Letter from Texaco re: inappropriately obtained documents | 1994 |
| 5 | 10 | Correspondence re: suit | 1995-1997 |
| 5 | 11 | Legal documents | 1995 |
| 5 | 12 | Plaintiffs' second request for documents related to class certification | 1995 |
| 5 | 13 | Plaintiffs' object to first set of interrogatories | 1995 |
| 5 | 14 | Response to motion schedule | 1995 |
| 5 | 15 | Plaintiffs' response to discovery schedule | 1995 |
| 5 | 16 | Plaintiffs' response to first set of interrogatories re: class issues | 1995 |
| 5 | 17 | Re: privileged documents – Affirmative Action plans | 1995 |
| 5 | 18 | Objection to Plaintiffs' Deposition notices | 1995 |
| 5 | 19 | Re: Discovery dispute – Definition of Texaco | 1995 |
| 5 | 20 | Re: Discovery improperly obtained Texaco documents | 1995 |
| 5 | 21 | Affidavit of John J. Howley | 1995 |
| 5 | 22 | Re: Agenda March 8 Conference | 1995 |
| 5 | 23 | Motion to quash subpoenas | 1995 |
| 5 | 24 | Plaintiffs' objection to Texaco's class discovery | 1995 |
| 5 | 25 | Discovery dispute – Star Enterprise | 1995 |
| 5 | 26 | Civil cause for Status conference | 1995 |
| 5 | 27 | Plaintiffs' objection to Texaco's discovery | 1995 |
| 5 | 28 | Plaintiffs' motion to quash subpoenas | 1995 |
| 5 | 29 | Legal document – Civil cause for Status conference | 1995 |

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| 5 | 30 | Plaintiffs' response to Texaco's motion to compel | 1995 |
| 5 | 31 | Plaintiffs' response to Texaco's "improperly obtained" documents | 1995 |
| 5 | 32 | Scope of non-party depositions | 1995 |
| 5 | 33 | Re: Plaintiffs' privilege objections | 1995 |
| 5 | 34 | Preliminary report on Statistical Considerations re: class certification issues | 1995 |
| 5 | 35 | Supplement to preliminary report on Statistical Considerations re: class certification issues | 1995 |
| 5 | 36 | Plaintiffs' memorandum of points/authorities in support of motion for class certification | 1995 |
| 5 | 37 | Notice of motion for class certification | 1995 |
| 6 | 1 | EEOC subpoena served on Plaintiffs | 1995 |
| 6 | 2 | Declarations of Plaintiffs' witnesses | 1995 |
| 6 | 3 | Letter to Judge Mark Fox from EEOC re: protective order | 1995 |
| 6 | 4 | Affidavit of John Howley re: Plaintiffs' "improperly obtained" documents | 1995 |
| 6 | 5 | Re: "Improperly obtained" documents | 1995 |
| 6 | 6 | Confidentiality of documents | 1995 |
| 6 | 7 | Expert Defense witness Charles Mann | 1995 |
| 6 | 8 | Striking Texaco's expert witness reports | 1995 |
| 6 | 9 | Litigation | 1995 |
| 6 | 10 | Litigation | 1995 |
| 6 | 11 | Plaintiffs' order to show cause why sanctions should not be imposed on Texaco | 1996 |
| 6 | 12 | Affidavit of Bari-Ellen Roberts | 1996 |
| 6 | 13 | Texaco statement to employees re: EEOC | 1996 |
| 6 | 14 | Motion to renew motion for class certification | 1996 |
| 6 | 15 | Motion for leave to amend | 1996 |
| 6 | 16 | Second amended complaint | 1996 |
| 6 | 17 | Hearing transcripts | 1996 |
| 6 | 18 | Motion for class certification and amended complaint | 1996 |
| 6 | 19 | Supplemental memorandum in support of Plaintiffs' motion for class certification | 1996 |
| 6 | 20 | Plaintiffs efforts to obtain finance departments master book | 1996 |
| 6 | 21 | Supplemental memo of law of plaintiff's motion for class certification | 1996 |
| 6 | 22 | Memorandum of law in support of Plaintiffs' order to show cause why sanctions should not be imposed on Texaco | 1996 |
| 6 | 23 | Order to show cause | 1996 |
| 7 | 1 | Litigation | 1996 |
| 7 | 2 | Memo regarding interim report of independent counsel | 1996 |
| 7 | 3 | Letter to Judge Brieant regarding Roberts v. Texaco and EEOC | 1996 |
| 7 | 4 | Escrow Agreement | 1996 |
| 7 | 5 | Letter to Judge Brieant from US department of Labor regarding Roberts v. Texaco | 1997 |

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|---|---|---|---|
| 7 | 6 | Stipulation and Settlement Agreement | 1997 |
| 7 | 7 | Letters of Appreciation regarding the suite | 1997 |
| 7 | 8 | Notice of Pendency of Class Action - Proposed Settlement and Fairness Hearing | 1997 |
| 7 | 9 | Plaintiff's Memorandum of Law of the proposed class action settlement | 1997 |
| 7 | 10 | Motion for Leave to file memorandum Amicus Curiae in support of Settlement Agreement | 1997 |
| 7 | 11 | Notice of Motion approval of proposed settlement application for award of attorney fees and reimbursement of expenses | 1997 |
| 7 | 12 | Memorandum of Law in support of class counsel application for an award of attorney fees | 1997 |
| 7 | 13 | Plaintiff's memorandum of law in support of named plaintiff's for incentive awards | 1997 |
| 7 | 14 | Memorandum to approve terms and conditions of settlement | 1997 |
| 7 | 15 | Plaintiff's submission in further support for the named plaintiffs for incentive awards | 1997 |
| 7 | 16 | Order appointing special master | 1997 |
| 7 | 17 | Judges Decree Settlement Instructions – Special Master Report Adoption | 1997 |
| 7 | 18 | Affidavit of V. Shinault filed in support of plaintiffs application for incentive awards | 1997 |
| 7 | 19 | Letter from Judge Brieant to Deval Patrick regarding chairing the task force | 1997 |
| 7 | 20 | Report of Special Master pursuant to order of court | 1997 |
| 7 | 21 | Special Master's report | 1997 |
| 7 | 22 | Plaintiff vs. Shinault objection to special master's report and recommendation relating to her incentive report | 1997 |
| 7 | 23 | Class member distribution fund letter | 1997 |
| 7 | 24 | Roberts' deposition | 1994 |
| 7 | 25 | Roberts' deposition | 1994 |
| 7 | 26 | Manuscript of Sil Chambers' deposition | 1994 |
| 7 | 27 | Deposition of Richard Lundwall | 1994 |
| 7 | 28 | Deposition of Pamela Gibson Akpotaire | 1995 |
| 7 | 29 | Deposition of John Berry | 1995 |
| 7 | 30 | Deposition of Katie Green Sampson | 1995 |
| 7 | 31 | Deposition of Gretchen Olford | 1995 |
| 7 | 32 | Deposition of Archie Wright, Sr. | 1995 |
| 7 | 33 | Deposition of Linda Burnett | 1995 |
| 8 | 1 | Deposition of Beatrice Hester | 1995 |
| 8 | 2 | Deposition of Victor Coleman | 1995 |
| 8 | 3 | Deposition of Helen Marie Richards | 1995 |
| 8 | 4 | Deposition of Ronnie Littlejohn | 1995 |
| 8 | 5 | Deposition of Linda Gail Calhoun | 1995 |
| 8 | 6 | Deposition of Jimmy Porter | 1995 |
| 8 | 7 | Deposition of Veronica Shinault | 1995 |

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| 8 | 8 | Deposition of Michael Dejoie | 1995 |
| 8 | 9 | Deposition of Steven Block | 1995 |
| 8 | 10 | Deposition of Marcia Harris | 1995 |
| 8 | 11 | Deposition of Peter Sherrill | 1995 |
| 8 | 12 | Deposition of Trevor Samuel | 1995 |
| 8 | 13 | Deposition of Larry J. Barnes | 1995 |
| 8 | 14 | Deposition of Alfred Webb | 1995 |
| 8 | 15 | Deposition of Marjorie Robinson | 1995 |
| 8 | 16 | Deposition of Lisa Williams | 1995 |
| 8 | 17 | Deposition of Richard Lundwall | 1996 |
| 8 | 18 | Declaration of Paulette East | 1995 |
| 8 | 19 | Declaration of Lisa Douglas | 1995 |
| 8 | 20 | Declaration of Katie Green Sampson | 1995 |
| 8 | 21 | Declaration of Johnny Berry | 1995 |
| 8 | 22 | Declaration of Gretchen Olford | 1995 |
| 8 | 23 | Declaration of Ellis Willis | 1995 |
| 8 | 24 | Declaration of Yolanda Carrasco | 1995 |
| 8 | 25 | Declaration of Victor Coleman | 1995 |
| 8 | 26 | Declaration of Ronnie Littlejohn | 1995 |
| 8 | 27 | Declaration of Eleanor Hunt | 1995 |
| 8 | 28 | Declaration of Kevin Brooks | 1995 |
| 8 | 29 | Declaration of Larry J. Barnes | 1995 |
| 8 | 30 | Declaration of Helen Marie Richards | 1995 |
| 8 | 31 | Declaration of Linda Burnette | 1995 |
| 8 | 32 | Declaration of Linda Calhoun | 1995 |
| 8 | 33 | Declaration of Stephen Wade Block | 1995 |
| 8 | 34 | Declaration of Delouis Houston | 1995 |
| 8 | 35 | Declaration of Donald Cheatham | 1995 |
| 8 | 36 | Declaration of Michael Moccio | 1995 |
| 8 | 37 | Declaration of Alfred Webb | 1995 |
| 8 | 38 | Declaration of Peter Sherrill | 1995 |
| 8 | 39 | Declaration of Trevor Samuel | 1995 |
| 8 | 40 | Declaration of Lisa Williams | 1995 |
| 8 | 41 | Declaration of Jimmy Porter | 1995 |
| 8 | 42 | Declaration of Marjorie Robinson | 1995 |
| 8 | 43 | Declaration of Archie Wright, Sr. | 1995 |
| 8 | 44 | Declaration of Patricia Akpotaire | undated |
| 8 | 45 | Declaration of Lawrence Lorber | 1997 |
| 8 | 46 | Affidavit of Edwin Giebel | 1995 |
| 8 | 47 | Affidavit Cyrus Mehri re: Tapes | 1996 |
| 9 | 1 | Affidavit Cyrus Mehri – support of Plaintiffs' motion for class certification | 1995 |

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| 9 | 2 | Affidavits of Daniel Berger and Michel Hausfeld | 1997 |
| 9 | 3 | Affidavit of James Offutz | 1997 |
| 9 | 4 | Affidavit of Stewart Schwab | 1997 |
| 9 | 5 | Affidavit of Charles Mann, Ph.D. | 1997 |
| 9 | 6 | Affidavit of Michael Rosenbaum | 1997 |
| 9 | 7 | Affidavit of Jay Lichtman | 1997 |
| 9 | 8 | Affidavit of Judith Goldfein | 1997 |
| 9 | 9 | Affidavit of Daniel Coquillette | 1997 |
| 9 | 10 | Affidavit of Leonard Biermann | 1997 |
| 9 | 11 | Affidavit of Bari-Ellen Roberts - support of incentive awards | 1997 |
| 9 | 12 | Affidavits of Gary Brouse and Lois Dauway | 1994, 1995 |
| 9 | 13 | Affidavit of Bari-Ellen Roberts – support of incentive awards – (Incomplete) | undated |
| 9 | 14 | Affidavit Janella Sue Martin | 1994 |
| 9 | 15 | Final Report of Independent Counsel | 1997 |
| 9 | 16 | Tape Transcripts and Endnotes discussed in Final Report of Independent Counsel | 1997 |
| | | | |
| | | **Series 3**: **Media Coverage, 1991-2001, undated** | |
| 9 | 17 | Cyrus Mehri Interview - *Corporate Crime Reporter* | 1994 |
| 9 | 18 | Request from Court TV to televise hearing | 1996 |
| 9 | 19 | Affirmative Action in Leading Schools | 1998 |
| 9 | 20 | Texaco – Vita: Members of Texaco Task Force | 1997 |
| 9 | 21 | Lundwall article – *New York Times* | 1997 |
| 9 | 22 | *The Final Call* – Million Women March | 1997 |
| 9 | 23 | *Network* – IWWG Newsletter profiling Bari- Ellen Roberts | 1997 |
| 9 | 24 | *The Nation* - Editorial re: Texaco | 1996 |
| 9 | 25 | *Black Enterprise* | 1994-1997 |
| 10 | 1 | *Time* | 1996, 1998 |
| 10 | 2 | *Essence* – Corporate Race Wars | 1997 |
| 10 | 3 | *New York Times – Proquest* | 1996-1997 |
| 10 | 4 | *Gannett News Service Focus* - Story Synopses | 1988-1997 |
| 10 | 5 | *Newsweek Magazine* – Race, Class, and Success | 1994 |
| 10 | 6 | *The Corporate Examiner* – Interfaith Center on Corporate Responsibility | 1994 |
| 10 | 7 | *Harper's* – Women in Business | 1998 |
| 10 | 8 | *Fortune* | 1998 |
| 10 | 9 | *Mosaic* | 1998 |
| 10 | 10 | *Emerge* | 2000 |
| 10 | 11 | *Working Woman* | 1998, 2001 |
| 10 | 12 | *The American Lawyer* | 1997 |
| 10 | 13 | *The Network Journal* | 1999 |
| 10 | 14 | *Jet* | 1997 |

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|---|---|---|---|
| 10 | 15 | Roberts vs. Texaco | 1994 |
| 10 | 16 | Roberts vs. Texaco – 1 of 3 | 1996 |
| 10 | 17 | Roberts vs. Texaco – 2 of 3 | 1996 |
| 10 | 18 | Roberts vs. Texaco – 3 of 3 | 1996 |
| 10 | 19 | Roberts vs. Texaco – 1 of 5 | 1997 |
| 10 | 20 | Roberts vs. Texaco – 2 of 5 | 1997 |
| 10 | 21 | Roberts vs. Texaco – 3 of 5 | 1997 |
| 10 | 22 | Roberts vs. Texaco – 4 of 5 | 1997 |
| 11 | 1 | Roberts vs. Texaco – 5 of 5 | 1997 |
| 11 | 2 | Roberts vs. Texaco – 1 of 4 | 1998 |
| 11 | 3 | Roberts vs. Texaco – 2 of 4 | 1998 |
| 11 | 4 | Roberts vs. Texaco – 3 of 4 | 1998 |
| 11 | 5 | Roberts vs. Texaco – 4 of 4 | 1998 |
| 11 | 6 | Roberts vs. Texaco | 1999 – 2000 |
| 11 | 7 | Newsclips outlining case | 1997-1998 |
| 11 | 8 | Newsclips re: Minority Discrimination | 1991, undated |
| 11 | 9 | *In Touch* – African American Newspaper | 1998 |
| 11 | 10 | *The Bull's Eye* – Nat. Assn. Securities Professionals | 1997 |
| 11 | 11 | Abstract "The Future of Racism" – Caleb Rosada, Ph.D. (Incomplete) | 1998 |
| 11 | 12 | Jesse Jackson and Texaco | undated |
| 11 | 13 | Press conference | 1998 |
| 11 | 14 | Texaco – *On Line News* | 1994 – 96 |
| 11 | 15 | Request from CBS News to interview Cyrus Mehri | 1997 |
| 11 | 16 | Request for interview by 60 Minutes | 1996 |
| | | | |
| | | **Series 4: Texaco, 1991-1998, undated** | |
| 11 | 17 | Texaco Information | 1996- 1998 |
| 11 | 18 | Texaco Federal Contract Complaint – Conciliation Agreement | 1994 |
| 11 | 19 | Finance Dept. Meeting Minutes | 1993-1995 |
| 11 | 20 | Texaco Performance Management Program | 1994 |
| 11 | 21 | Texaco Sensitivity Training | undated |
| 11 | 22 | Texaco Job Posting Policy | undated |
| 11 | 23 | Texaco Mentoring Program | undated |
| 11 | 24 | Texaco High Potential Program | undated |
| 11 | 25 | Ulrich – Human Potential Committee | 1994 |
| 11 | 26 | Sil Chambers' PMP Appeal | 1993 |
| 11 | 27 | Sil Chambers' PMP Appeal | 1994 |
| 11 | 28 | Performance and Development Review Survey Results | 1994 |
| 12 | 1 | Texaco Human Resources Development Minutes | 1993 |
| 12 | 2 | Texaco Correspondence | 1994-1995 |

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

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| 13 | 9 | BER Affirmation in Lundwall/Ulrich suit | 1997 |
| 13 | 10 | Multiple Motions in U.S. vs. Richard Lundwall | 1997 |
| 13 | 11 | J. David Keough vs. Texaco – liable for "K" involvement on Tapes | 1998 |
| | | | |
| | | **Series 5: Book, 1997-1998, undated** | |
| 13 | 12 | Jack White: Credentials – Writing Samples | 1997 |
| 13 | 13 | Collaboration Agreement: Bari-Ellen Roberts with Jack White | undated |
| 13 | 14 | Faith Childs' Literary Agency | 1997 |
| 13 | 15 | Book contract Avon Books with Bari-Ellen Roberts | undated |
| 13 | 16 | Book publication – Related materials – exchanges with publisher | 1997 |
| 13 | 17 | Publisher's Obligations | 1997-1998 |
| 13 | 18 | Jack White – Scope of Book | undated |
| 13 | 19 | Correspondence from Avon Editor | undated |
| 13 | 20 | Manuscript pages | 1997 |
| 13 | 21 | Press release Avon Books | undated |
| 13 | 22 | Book Promotion | undated |
| 13 | 23 | Book Cover | undated |
| 13 | 24 | Request for liners for Book Cover | undated |
| 13 | 25 | Book Listings/ Reviews | undated |
| 13 | 26 | Faith Childs Literary Agency – Complimentary Copies | undated |
| 13 | 27 | Faith Childs Literary Agency Forthcoming Projects | undated |
| 13 | 28 | Correspondence re: Book | undated |
| 13 | 29 | Texaco news clips for Jack White from *Time* Research Center | undated |
| 13 | 30 | Correspondence from Texaco's Attorney re: galley proofs of book | undated |
| 13 | 31 | Peter Bijur's decline for an interview with Jack White | 1997 |
| 13 | 32 | Press Release: Avon Books acquisition of Book | 1997 |
| 13 | 33 | Letter to Andrea Christensen re: her objections to her portrayal in book | 1997 |
| 13 | 34 | Fan letters re: Book | 1998 |
| 13 | 35 | Acknowledgements Page | 1998 |
| 13 | 36 | Tape 2 – Side 1 [transcript] | 1997 |
| 13 | 37 | Tape 1 – Side 2 [transcript] | 1997 |
| 13 | 38 | Tape 2 – Sides 1 and 2 [transcript] | 1997 |
| 14 | 1 | Tape 3 – Side 1 [transcript] | 1997 |
| 14 | 2 | Tape 4 – Side 1 [transcript] | 1997 |
| 14 | 3 | Tape 4 – Side 2 [transcript] | 1997 |
| 14 | 4 | Tape 5 – Side 1 [transcript] | 1997 |
| 14 | 5 | Tape 5 – Side 2 [transcript] | 1997 |
| 14 | 6 | Tape 4 – Side 1 [transcript] | 1997 |
| 14 | 7 | Tape 4 – Side 2 [transcript] | 1997 |
| 14 | 8 | Tape 5 – Side 1 [transcript] | 1997 |
| 14 | 9 | Tape 5 – Side 2 [transcript] | 1997 |

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| 14 | 10 | Tape 6 – Side 1 [transcript] | 1997 |
| 14 | 11 | Tape 7 – Side 1 [transcript] | 1997 |
| 14 | 12 | Tape 7 – Side 2 [transcript] | 1997 |
| 14 | 13 | Tape 8 – Side 1 [transcript] | 1997 |
| 14 | 14 | Tape 9 – Side 1 [transcript] | 1997 |
| 14 | 15 | Tape 9 – Side 2 [transcript] | 1997 |
| 14 | 16 | Tape 10 – Side 1 [transcript] | 1997 |
| 14 | 17 | Tape 4 – Side –1 [transcript] | 1997 |
| 14 | 18 | Tape 4 – Side 2 [transcript] | 1997 |
| 14 | 19 | Tape 1 [transcript] | 1997 |
| 14 | 20 | Tape 2 [transcript] | 1997 |
| 14 | 21 | Tape 3 [transcript] | 1997 |
| 14 | 22 | Tape 4 – Side 1 [transcript] | 1997 |
| 14 | 23 | Mediation - Tape 2 – Sides 1 and 2 [transcript] | 1997 |
| 14 | 24 | Mediation - Tape 3 – Sides 1 and 2 [transcript] | 1997 |
| 14 | 25 | Tape 1 – Sides 1 and 2 [transcript] | 1997 |
| 14 | 26 | Tape 2 – Sides 1 and 2 [transcript] | 1997 |
| 14 | 27 | Tape 1 – Sides 1 and 2 [transcript] | 1997 |
| 14 | 28 | Tape 2 [transcript] | 1997 |
| 14 | 29 | Tape 3 [transcript] | 1997 |
| 14 | 30 | Tape 4 [transcript] | 1997 |
| 15 | 1 | Tape 5 [transcript] | undated |
| 15 | 2 | Tape 7 [transcript] | undated |
| 15 | 3 | Tape 8 [transcript] | undated |
| 15 | 4 | Tape 9 [transcript] | undated |
| 15 | 5 | Tape 10 [transcript] | 1997 |
| 15 | 6 | Tape 11 [transcript] | 1997 |
| 15 | 7 | Tape 12 [transcript] | 1997 |
| 15 | 8 | Tape 1 – Sides 1 and 2 – re: Settlement [transcript] | 1997 |
| 15 | 9 | Tape 1 – Sides 1 and 2 [transcript] | 1997 |
| 15 | 10 | Tape 2 – Sides 1 and 2 [transcript] | 1997 |
| 15 | 11 | Tape 3 – Side 1 [transcript] | 1997 |
| 15 | 12 | Tape 2 – Sides 1 and 2 – re: Tape [transcript] | 1997 |
| 15 | 13 | Tape 1 – Side 1 re: Recruiting [transcript] | 1997 |
| 15 | 14 | Tape 2 – Sides 1 and 2 [transcript] | 1997 |
| 15 | 15 | Tape 2 – Sides 1 and 2 [transcript] | 1997 |
| 15 | 16 | Tape 3 – Sides 1 and 2 [transcript] | 1997 |
| 15 | 17 | Tape 4 – Sides 1 and 2 [transcript] | 1997 |
| 15 | 18 | Tape 1 – Sides 1 and 2 [transcript] | 1997 |
| 15 | 19 | Draft of Chapter 6 | undated |
| 15 | 20 | Draft of Chapters 1 to 10 | undated |

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| 16 | 1 | Early draft of Book | undated |
| 16 | 2 | More complete copy of manuscript of Book | undated |
| 16 | 3 | Galley Proofs of Book | undated |
| 16 | 4 | Manuscript: pp. 1-74 | undated |
| 16 | 5 | Manuscript: pp. 76-171 | undated |
| 16 | 6 | Manuscript: pp.172-259 | undated |
| 16 | 7 | *Roberts vs. Texaco* [hardcover] | 1996 |
| | | | |
| | | **Series 6**: **Other related corporate suits, 1994-1999, undated** | |
| 17 | 1 | Shell Oil Co. LawSuit Materials | 1996 |
| 17 | 2 | Settlement of Similar Cases | undated |
| 17 | 3 | Gardette vs. Heublein | undated |
| 17 | 4 | Boycott of Crown Petroleum | 1999 |
| 17 | 5 | Oregon Case Re: Discrimination | 1995 |
| 17 | 6 | Discrimination Suit against Sikorsky Aircraft | 1997 |
| 17 | 7 | Class Action Discrimination Suit against Sikorsky Aircraft | 1997 |
| 17 | 8 | Letter with information of experience in pending class action suit | 1998 |
| 17 | 9 | ARCO Notice of Annual Stockholders Meeting | 1994 |
| 17 | 10 | Consultation on Racial Harassment Cases | 1998 |
| | | | |
| | | **Series 7**: **Audiovisual Materials, 1995-1998, undated** | |
| 18 | 1 | Chambers, Sil – Disc from Mystic Word [3.5” floppy disk] | undated |
| 18 | 2 | Chambers, Sil [audiocassette] | 1997 |
| 18 | 3 | Chambers, Sil [audiocassette] | 1997 |
| 18 | 4 | Chambers. Sil [audiocassette] | 1997 |
| 18 | 5 | Chambers, Sil [audiocassette] | 1997 |
| 18 | 6 | Hausfeld, Mike - #1 [audiocassette] | undated |
| 18 | 7 | Hausfeld, Mike - #2 [audiocassette] | undated |
| 18 | 8 | Mehri, Cyrus - #1 [audiocassette] | 1997 |
| 18 | 9 | Mehri, Cyrus - #2 [audiocassette] | undated |
| 18 | 10 | Mehri, Cyrus - #3 [audiocassette] | undated |
| 18 | 11 | Mehri, Cyrus - #4 [audiocassette] | undated |
| 18 | 12 | Mehri, Cyrus - #5 [audiocassette] | 1997 |
| 18 | 13 | Mehri, Cyrus - #5 [audiocassette] | undated |
| 18 | 14 | Mehri, Cyrus - #6 [audiocassette] | undated |
| 18 | 15 | Mehri, Cyrus - #8 [audiocassette] | undated |
| 18 | 16 | Mehri, Cyrus - #9 [audiocassette] | 1997 |
| 18 | 17 | Mehri, Cyrus - #10 [audiocassette] | undated |
| 18 | 18 | Mehri, Cyrus - misc. I [audiocassette] | undated |
| 18 | 19 | Mehri, Cyrus - misc. II [audiocassette] | undated |
| 18 | 20 | Roberts, Bari-Ellen - Mediation - #1 [audiocassette] | undated |

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| 18 | 21 | Roberts, Bari-Ellen - Mediation - #3 [audiocassette] | undated |
| 18 | 22 | Unidentified [Hans] [audiocassette] | 1997 |
| 18 | 23 | Unidentified [Drawl] [audiocassette] | undated |
| 19 | 1 | Texaco's Stockholders' Meeting – Rye, N.Y. [VHS tape] | 1995 |
| 19 | 2 | Black History Challenge – Texaco vs. NYNEX [VHS tape] | 1995 |
| 19 | 3 | Texaco Timeline [VHS tape] | 1996 |
| 19 | 4 | Texaco, Inc. – Jesse Jackson and Peter Bijur [VHS tape] | 1996 |
| 19 | 5 | Peter Bijur Interviews – Black Entertainment Television – Lead Story – CNN Late Edition with Frank Sesno [VHS tape] | 1996 |
| 19 | 6 | Peter Bijur – Remarks to Westchester County Assn. [VHS tape] | 1996 |
| 19 | 7 | CBS Evening News – Black and White and Green [VHS tape] | 1996 |
| 19 | 8 | Texaco's Plan – CNBC [VHS tape] | 1996 |
| 19 | 9 | CBS Evening News – Anti-Semitism [VHS tape] | 1996 |
| 19 | 10 | Roberts vs. Texaco – Bari-Ellen Roberts (Author) – Bloomberg Forum [VHS tape] | 1998 |
| 20 | 1 | Book Signing [VHS tape] | 1998 |
| 20 | 2 | Betty Baye Show #11 [VHS tape] | undated |
| 20 | 3 | Mom's Show [VHS tape] | undated |
| 20 | 4 | Texaco Press Conference – NBC. ABC – I [VHS tape] | undated |
| 20 | 5 | Texaco Press Conference – NBC. ABC – II [VHS tape] | undated |
| 20 | 6 | Texaco Miscellaneous [VHS tape] | undated |
| 20 | 7 | Pueblo Bonito – Hotels and Resorts – Mazatlan – Los Cabos [VHS tape] | undated |
| 20 | 8 | unidentified cassette I [VHS tape] | undated |
| 20 | 9 | unidentified cassette II [VHS tape] | undated |
| 20 | 10 | Roberts vs. Texaco – TALK NEW YORK [VHS tape] | 1998 |