SETTLEMENT AGREEMENT

The parties to this Settlement Agreement are IATSE Local 28 (Union) and MERC/Metro (Employer). This Settlement Agreement applies to the P5 bargaining unit.

WHEREAS, the Union filed a grievance on February 28, 2019 alleging the Employer was violating Articles 1.1 and 5.2 by hiring Relief Department Heads directly rather than requesting they be dispatched by the Union; and

WHEREAS, the parties wish to resolve the grievance and clarify the process for requesting Relief Heads;

THE PARTIES HEREBY AGREE to the following terms:

1. Department Heads will continue to recommend the Relief Head they would like the Employer to use during their absence.

2. The Employer will then request the Union to dispatch a Relief Head to replace the Department Head. The Employer may request a particular Relief Head by name (e.g. the person recommended by the Department Head). The Union will comply with the request by name, provided the person requested is on the Union's hiring hall list A-F and is available for the call. The Employer may also request the Union to dispatch a Relief Head without requesting a specific individual by name. In such a case, the Union will dispatch the highest individual on the hiring hall list with the skills and qualifications needed for the call.

3. The Union hereby withdraws the February 28, 2019 relief head grievance.

4. This Agreement shall not constitute admission by either party of any wrongdoing. This Agreement shall not be construed as a waiver of any future claims that post-date the execution of this Agreement.

For Metro:

5/10/19

Ross Hume Date
Labor Relations Program Manager
Metro

Terry Smith 05.10.19

Terry Smith Date
Employee Engagement Manager
Metro

For IATSE Local 28:

5/30/19

Rose Etta Venetucci Date
Business Agent/Representative
IATSE Local 28