

Metropolitan Detroit Professionals

UAW-Local 2200
5201 Woodward Avenue
Detroit, Michigan 48202



Trinee Moore,
Director Detroit Public Library
5201 Woodward Avenue
Detroit, Michigan 48202

Tuesday, February 15, 2011

Ms. Trinee Moore:

This letter is for informational purposes. APL and POOL Article 15, specifically 15.03 which states "In the event that it becomes necessary to lay off employees for a period of thirty (30) consecutive calendar days or more, the Employer ***shall*** post a notice advising the employees that those who wish to go on layoff for a stated length of time, not to exceed six (6) months, may sign up for said temporary layoff.

I highlighted the word "shall" by using bold and italics in order to draw attention to the single word, which requires the administration to follow this article. Black's Law Dictionary seventh edition defines the word shall as "has a duty to; or more broadly is required to", therefore when we use this definition the article would read thusly "In the event that it becomes necessary to lay off employees for a period of thirty (30) consecutive calendar days or more, the Employer (has a duty to; or more broadly is required to) post a notice advising the employees that those who wish to go on layoff for a stated length of time, not to exceed six (6) months, may sign up for said temporary layoff.

This article has been honored in the past and we fully expect it will be honored this time as well.

If the Administration has any question about implementing this article please contact us so that our members can exercise their contractual rights under this article.

Regards,

Michael Wells, President UAW LU 2200

C: file

Tony Feyers, UAW Region One International Representative
Dorothy Jean Williams, UAW LU 2200 Vice President
Sue Nairn, APL Unit Chair
Joan Brand, POOL Unit Chair

March 2, 2011

Mr. Michael Wells, President
UAW-LU2220
Detroit Public Library
5201 Woodward Avenue
Detroit, MI 48202

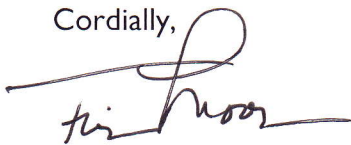
Dear Mr. Wells:

In response to your letter dated February 15, 2011, regarding posting a notice for voluntary lay-offs, please know that the Administration does not consider the pending lay-offs as temporary, but rather, permanent. The APL and POOL Article 15.03 states "In event that it becomes necessary to lay off employees for a period of thirty (30) consecutive days or more, the Employer shall post a notice advising the employees that those who wish to go on layoff for a stated length of time, not to exceed six (6) months, may sign up for said temporary layoff.

Based on our financial projections, it is estimated that it will take the Library a minimum of two (2) years to regain financial stability. As such, we cannot commit to calling- back laid-off employees within the stated time period of six (6) months.

This matter has also been referred to legal counsel; however, until we receive a legal opinion our position to not post for voluntary lay-offs will remain.

Cordially,



Trinee Moore, Director
Human Resources

J.G. Mondowney, Executive Director
Tony Feyers, UAW Region One International Representative
Dorothy Jean Williams, UAW LU 2200, Vice President
Sue Narin, APL Unit Chair
Joan Brand, POOL Unit Chair

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UAW-Local 2200
5201 Woodward Avenue
Detroit, Michigan 48202



Friday, March 04, 2011

Ms Trinee Moore
Associate Director for Human Resources
Detroit Public Library

Dear Ms. Moore:

UAW Local Union 2200 is requesting an immediate step three grievance hearing for the following grievance. APL Grievance 03-2011 and POOL Grievance 04-2011; failure to honor contract language in both the APL and POOL contracts on the matter of layoffs in inverse seniority.

Article 15 in both contracts contain language in section 15.04, POOL and 15.03 APL stating that "the Employer shall post a notice advising the employees that those who wish to go on lay off for a stated length of time, not to exceed six (6) months, may sign up for said temporary layoff".

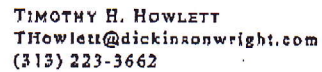
Our Local sent a letter to your office dated Tuesday, February 15, 2011 stating our position on this matter. The Administration has decided to ignore both our letter and the contract language, which now requires our Local to file a grievance in order to seek a resolution to this matter.

Regards,

Michael Wells, President UAW LU 2200

C: file ✓

Tony Feyers, UAW Region One International Representative
Dorothy Jean Williams, UAW LU 2200 Vice President
Sue Nairn, APL Unit Chair
Joan Brand, POOL Unit Chair



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