



COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF LABOR RELATIONS
PETITION FOR MEDIATION AND FACT-FINDING
IN PUBLIC EMPLOYMENT OR VOLUNTARY
INTEREST MEDIATION

DO NOT WRITE IN THIS SPACE

Case No.

PS-19-7668

Date Filed

10-30-19

The petitioner hereby requests that the DLR proceed under the applicable provisions of M.G.L. c.150E, Section 9, M.G.L.c.150, Section 6 and 456 CMR 21.00.

1. Employer's Name Winthrop Public Schools		2. Telephone Number 617-846-5500
3. Employer's Address (street and no., city/town, state, and zip code) One Metcalf Square, Winthrop, MA 02152		4. Fax Number 617-539-0891
5. Employer's Labor Relations Representative Paul J Hodnett, Esq.	6. Email Address phodnett@rubinrudman.com	7. Telephone Number 617-330-7134
8. Employer's Representative's Address (street and no., city/town, state, and zip code) Rubin and Rudman LLP, 53 State Street, Boston, MA 02109		9. Fax Number 617-330-7550
10. Labor Organization's Name Winthrop Teachers Association		11. Telephone Number 617-610-2888
12. Labor Organization's Address (street and no., city/town, state, and zip code) A.T. Cummings School, 40 Herman Street, Winthrop, MA 02152		13. Fax Number
14. Labor Organization's Representative's Name Lisa Nazzaro	15. Email Address lnazzaro@massteacher.org	16. Telephone Number 617-331-4144
17. Labor Organization's Representative's Address (street, city/town, state, and zip code) 50 Salem Street, Building B, Suite 9, Lynnfield, MA 01940		18. Fax Number 781-295-4879

19. This Petition is being filed: (check one)

Jointly ☒ (If checked, complete sections 26 through 31 and skip section 32)

Employer Only ☐ (if checked, complete sections 26 - 28 & 32, skip sections 26-28)

Labor Org. Only ☐ (if checked, complete sections 29 - 31 & 32, skip sections 26-28)

20. Description of Collective Bargaining Unit Involved: Teachers, librarians, school psychologist, adjustment counselors, etc.	21. Number of Employee in Unit: 184
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22. Brief Statement of Issue(s) Over Which Impasse Exists:
Wages, Start/End time for teacher school day, teacher duties, common planning time

23. Contract Expiration Date: August 31, 2019	24. Date Negotiations Commenced: November 2018	25. # Negotiation Sessions to Date 7+
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26. Employer's Representative Name Paul J. Hodnett, Esq.	27. Signature /s/ Paul J. Hodnett, Esq.	28. Date October 28, 2019
29. Labor Organization's Rep.'s Name Lisa Nazzaro	30. Signature /s/ Lisa Nazzaro	31. Date October 28, 2019

32. CERTIFICATE OF SERVICE

I hereby certify that I have served a copy of this Petition on the representative of the opposing party.

Method of Service ☐ In hand ☐ First Class Mail ☐ Other (specify): _____

Signature and Title of Person making Certification

801 CMR 4.00

4.02: 456 Department of Labor Relations

(4) The filing fee for a petition for mediation and fact-finding pursuant to M.G.L. Chapter 150, s.6 and 456 CMR 21.03 or for a request for voluntary interest mediation pursuant to 456 CMR 21.04 is \$1,000; provided, however, that the fee shall be paid in equal shares by the party seeking application and the answering party; provided, further, that the Director of the Department of Labor Relations may, where appropriate, provide for the waiver of the filing fee for any particular controversy or classes of controversies.



53 STATE STREET | BOSTON, MA 02109 | P:617-330-7000
800 CONNECTICUT AVE. NW | WASHINGTON, DC 20006 | P:202-794-6300
99 WILLOW STREET | YARMOUTHPORT, MA 02675 | P:508-362-6262

Paul J. Hodnett
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Direct Fax: 617-330-7550
E-mail: PHodnett@rubinrudman.com

October 28, 2019

Commonwealth of Massachusetts
Department of Labor Relations
19 Staniford Street, 1st Floor
Boston, MA 02114

Re: **Petition for Contract Mediation**
Winthrop Public Schools and Winthrop Teachers Association

Dear Sir or Madam:

Enclosed please find a Joint Petition for Contract Mediation. Please process this request.

Thank you.

Very truly yours,

A handwritten signature in black ink, appearing to read 'Paul J. Hodnett', with a long horizontal flourish extending to the right.

Paul J. Hodnett

cc.
Lisa Nazzaro, MTA

Lisa Howard, Superintendent of Schools