

COMMONWEALTH OF MASSACHUSETTS

DEPARTMENT OF LABOR RELATIONS

FERRUCCIO ROMEO)
v.)
TOWN OF WINTHROP)

Case Number: MUP-19-7261

ANSWER

COUNT ONE

1. The Town admits Paragraphs 1, 2, 3, 4, 5 of the Complaint.
2. The Town denies Paragraph 6 of the Complaint.
3. The Town admits Paragraphs 7, 8, 9, 10, 11, 12, 13, 14, and 15 of the Complaint.
4. The Town denies Paragraph 16 of the Complaint.
5. The Town admits Paragraph 17 of the Complaint.
6. The Town denies Paragraphs 18, 19, 20, 21, and 22 of the Complaint.

COUNT TWO

7. The Town realleges its answers in Paragraphs 1 through 22 of the Complaint.
8. The Town admits Paragraphs 24, 25, 26, 27, 28, 29, 30 and 31 of the Complaint.
9. The Town denies Paragraphs 32, 33, 34, 35 and 36 of the Complaint.

FIRST AFFIRMATIVE DEFENSE

The charging party's claims are barred to the extent that they fail to establish a violation of Chapter 150E.

SECOND AFFIRMATIVE DEFENSE

The charge is untimely and barred by the applicable statute of limitations.

THIRD AFFIRMATIVE DEFENSE

The Complaint fails to state a claim upon relief may be granted.

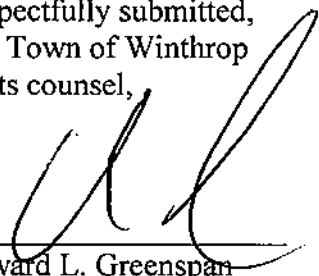
FOURTH AFFIRMATIVE DEFENSE

The Respondent has complied with all laws and regulations and otherwise satisfied its statutory obligations under G.L. Chapter 150E.

FIFTH AFFIRMATIVE DEFENSE

The Union did not pursue any grievances filed under the terms and provisions under the Collective Bargaining Agreement.

Respectfully submitted,
The Town of Winthrop
by its counsel,



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