

January 20, 2016

Lisa Joins, Administrator, Human Resources  
Keck Medical Center of USC  
2011 N. Soto Street HR II  
Los Angeles, CA 90032

Re: NUHW and Keck Hospital of USC (Alleged Impasse)

Dear Ms. Joins:

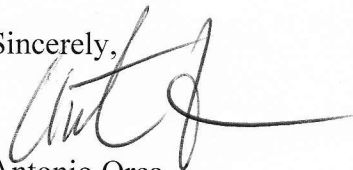
This letter is in response to your letter dated January 19, 2016 to Michael Torres and me. NUHW disagrees with Keck Hospital of USC's ("Keck") declaration of impasse. As you know, the parties were still negotiating on the staffing grid and NUHW had expressed its willingness to meet and reach an overall agreement including on the issue that is currently the subject of an unfair labor practice charge in NLRB 21-CA-162098. Based on the foregoing, NUHW's position is that there is no valid impasse under the NLRB standards.

In addition, NUHW objects to your picking and choosing which of the parties' tentative agreements that Keck is implementing. For example, your letter states that Keck "will implement all tentatively agreed items, other than the side letters." The side letters are part of the overall agreement and there is no legal basis for this decision other than the fact that Keck's implementation of the proposal is in bad faith. Keck clearly does not want to be bound by the no-subcontracting provision and has therefore, made an unlawful distinction in implementation of the alleged last, best and final offer.

Finally, it is clearly illegal for you to meet with NUHW members to review the implementation of the contract. It is NUHW's position that you are once again attempting to directly bargain with the NUHW membership.

NUHW is, as always, ready to meet and bargain in good faith an agreement. NUHW will take all necessary legal and economic action necessary to protect our members. If Keck is available to resolve our difference and negotiate in good faith, please do not hesitate to contact me to schedule bargaining with the mediator.

Sincerely,



Antonio Orea

cc: NUHW Bargaining Team  
Sal Rosselli, President  
Michael Torres, Organizer