



**STATE OF CALIFORNIA
PUBLIC EMPLOYMENT RELATIONS BOARD
UNFAIR PRACTICE CHARGE**

DO NOT WRITE IN THIS SPACE:

Case No:

Date Filed:

INSTRUCTIONS: File this charge form via the e-PERB Portal, with proof of service. Parties exempt from using the e-PERB Portal may file the original charge in the appropriate PERB regional office (see PERB Regulation 32075), with proof of service attached. Proper filing includes concurrent service and proof of service of the charge as required by PERB Regulation 32615(c). All forms are available from the regional offices or PERB's website at www.perb.ca.gov. If more space is needed for any item on this form, attach additional sheets and number items.

IS THIS AN AMENDED CHARGE? YES If so, Case No. NO

1. CHARGING PARTY: EMPLOYEE EMPLOYEE ORGANIZATION EMPLOYER PUBLIC¹

a. Full name: United Teachers Los Angeles

b. Mailing address: 3303 Wilshire Blvd., 10th Floor, Los Angeles, CA 90010

c. Telephone number:

d. Name and title of person filing charge: Michael Plank, Attorney E-mail Address: mplank@bushgottlieb.com
Telephone number: (818) 973-3200

e. Bargaining unit(s) involved: Certificated Employees

2. CHARGE FILED AGAINST: (mark one only) EMPLOYEE ORGANIZATION EMPLOYER

a. Full name: Los Angeles Unified School District

b. Mailing address: 333 S. Beaudry Avenue, Los Angeles, CA 90017

c. Telephone number: (213) 241-1000

d. Name and title of agent to contact: Kristen Murphy, Chief of Employee Support & Labor Relations E-mail Address: kristen.murphy@lausd.net
Telephone number:

3. NAME OF EMPLOYER (Complete this section only if the charge is filed against an employee organization.)

a. Full name:

b. Mailing address:

4. APPOINTING POWER: (Complete this section only if the employer is the State of California. See Gov. Code, § 18524.)

a. Full name:

b. Mailing address:

c. Agent:

¹ An affected member of the public may only file a charge relating to an alleged public notice violation, pursuant to Government Code section 3523, 3547, 3547.5, or 3595, or Public Utilities Code section 99569.

5. GRIEVANCE PROCEDURE

Are the parties covered by an agreement containing a grievance procedure which ends in binding arbitration?

Yes No Unknown

6. STATEMENT OF CHARGE

- a. The charging party hereby alleges that the above-named respondent is under the jurisdiction of: (check one)
 - Educational Employment Relations Act (EERA) (Gov. Code, § 3540 et seq.)
 - Ralph C. Dills Act (Gov. Code, § 3512 et seq.)
 - Higher Education Employer-Employee Relations Act (HEERA) (Gov. Code, § 3560 et seq.)
 - Meyers-Milias-Brown Act (MMBA) (Gov. Code, § 3500 et seq.)
 - One of the following Public Utilities Code Transit District Acts: San Francisco Bay Area Rapid Transit District Act (SFBART Act) (Pub. Util. Code, § 28848 et seq.), Orange County Transit District Act (OCTDA) (Pub. Util. Code, § 40000 et seq.), and Sacramento Regional Transit District Act (Sac RTD Act) (Pub. Util. Code, § 102398 et seq.)
 - The Los Angeles County Metropolitan Transportation Authority Transit Employer-Employee Relations Act (TEERA) (Supervisory Employees of the Los Angeles County Metropolitan Authority (Pub. Util. Code, § 99560 et seq.)
 - Trial Court Employment Protection and Governance Act (Trial Court Act) (Article 3; Gov. Code, § 71630 – 71639.5)
 - Trial Court Interpreter Employment and Labor Relations Act (Court Interpreter Act) (Gov. Code, § 71800 et seq.)
- b. The specific Government or Public Utilities Code section(s), or PERB regulation section(s) alleged to have been violated is/are: 3543.5(a), 3543.5(b), and 3543(c) Unknown
- c. For MMBA, Trial Court Act and Court Interpreter Act cases, if applicable, the specific local rule(s) alleged to have been violated is/are **(a copy of the applicable local rule(s) MUST be attached to the charge)**:
- d. Provide a clear and concise statement of the conduct alleged to constitute an unfair practice including, where known, the time and place of each instance of respondent’s conduct, and the name and capacity of each person involved. This must be a statement of the facts that support your claim and *not conclusions of law*. A statement of the remedy sought must also be provided. *(Use and attach additional sheets of paper if necessary.)* See attached


Please see UPC Attachment

DECLARATION

I declare under penalty of perjury that I have read the above charge and that the statements herein are true and complete to the best of my knowledge and belief and that this declaration was executed on 10/05/2022 (Date)

at Glendale, California (City and State)

Michael Plank, Attorney (Type or Print Name and Title, if any)

 (Signature)

Mailing Address: 801 North Brand Blvd., Suite 950
Glendale, CA 91203

E-Mail Address: mplank@bushgottlieb.com

Telephone Number: (818) 973-3200

ATTACHMENT TO UNFAIR PRACTICE CHARGE OF CHARGING PARTY

I. INTRODUCTION

1. The Los Angeles Unified School District (“LAUSD” or “the District”) has violated the Educational Employment Relations Act (“EERA”) by failing to provide information relevant and necessary information as requested by United Teachers Los Angeles (“UTLA”), and has interfered with UTLA’s representational rights, and the rights of its members. As set forth in more detail below, LAUSD failed to timely provide complete responses to UTLA’s requests for relevant information. Additionally, LAUSD has failed to respond to UTLA’s requests to meet and confer regarding the impact of job reassignments within the bargaining unit.

II. PARTIES

2. At all times relevant herein, LAUSD has been a “public school employer” pursuant to Government Code section 3540.1(k).

3. At all times relevant herein, UTLA has been a “certified employee organization” pursuant to Government Code section 3540.1(b) and the exclusive representative of a bargaining unit of certified employees (i.e., public school teachers and other employees) of LAUSD.

III. ALLEGATIONS

A. Background

4. On September 6, 2022, pursuant to EERA, Section 3540, UTLA requested information necessary and relevant for enforcement of the collective bargaining agreement and for informing ongoing contract negotiations. UTLA requested this information after learning that the District was reassigning unit members unilaterally, in an effort to obscure the true number of job vacancies in LAUSD, and leading to changes in working conditions for all those bargaining unit members at the school sites where there were new vacancies due to the unilateral reassignment. These vacancies have also led to LAUSD effectively repudiating staffing ratios negotiated in the CBA, because those numbers have been obscured, and without UTLA having any opportunity to bargain over impacts and effects. This information that UTLA requested included 14 specific requests, related to the general topics of 1) vacancies in the UTLA bargaining unit and temporary transfers to fill vacant positions (requests 1-3); 2) the current number of permanent, temporary, and vacant counselor positions (requests 4-6); 3) the current number of filled, vacant, and temporarily vacant school nurse positions due to reassignment, and the number of school health clerks currently employed to support School Nurses and the number of school health clerk budgeted positions (requests 7-10); 4) the current number of budgeted, filled, and vacant librarian positions (requests 11-12); 5) information concerning budgeted special education classroom reaching positions (request 13); and 6) reiterated request for information about standardized testing in LAUSD (request 14). UTLA requested that the District submit this information by September 16, 2022. A copy of this request is attached as Exhibit A.

5. On September 16, 2022 UTLA demanded to meet and confer with the District over the District's unilateral reassignment of UTLA bargaining unit members and the resulting impact on working conditions for the entire bargaining unit. UTLA requested dates from the District during the week of September 19 to proceed. A copy of this correspondence is attached as Exhibit B. On the same day, UTLA also reiterated to the District that it had not received a response to its September 6 request for information, and that given the urgency of the situation, it again requested that the District provide the requested information immediately. A copy of this correspondence is attached as Exhibit C.

6. On September 19, 2022 the District responded with some, but not all, of the information requested in requests 7-10, but asked for clarification about the relevance of information about school health clerks. It also stated that the remaining items requested were still being processed.

7. On September 21, UTLA resubmitted its request for information to the District, and explained the relevance of the information about school health clerks. UTLA also stated that it hoped to receive the rest of the requested information that day. Later that day, LAUSD provided information regarding the school health clerks, but nothing further.

8. On September 27, 2022 the District once again submitted some, but not all, of the information requested. The District submitted information responsive to request numbers 4-6 and 11-13.

9. On September 30, 2022, UTLA renewed its demand to meet and confer over the District's unilateral reassignment of UTLA bargaining unit members. A copy of this correspondence is attached as Exhibit D.

10. To date, UTLA still has not received any of the information requested in request numbers 1, 2, 3, related to the District's vacancies and reassignments. Nor has the District provided information in response to request number 14 related to standardized testing. Nor has LAUSD responded to UTLA's demand to meet and confer over the District's unilateral reassignment of UTLA bargaining unit members.

B. Failure to Provide Information and Failure to Bargain

11. UTLA requested information relevant and necessary to bargaining from the District on September 6, 2022 and, as detailed above, still have yet to receive all the information requested. LAUSD submitted incomplete documents and information over the course of September only at the continued insistence of UTLA. LAUSD's incomplete and untimely submission of documents violates EERA Section 3543.5(c). A refusal to provide information is a refusal to bargain in good faith. Additionally, "An unreasonable delay in providing requested information is tantamount to a failure to produce the information at all." *Los Angeles Unified School District* (2015) PERB Decision No. 2438 (*Citing to Chula Vista City School District* (1990) PERB Decision No. 834.) LAUSD's failure to respond to UTLA's demand to meet and confer over the District's unilateral reassignment of UTLA bargaining unit members also violates EERA Section 3543.5(c).

LAUSD's failure to timely provide information in response to UTLA's requests, and its failure to respond to UTLA's demand to meet and confer, also interfere with teachers' rights under EERA, and as such violate section 3543.5(a) of EERA.

LAUSD's failure to timely provide information in response to UTLA's requests, and its failure to respond to UTLA's demand to meet and confer, also interfere with UTLA's right to represent members of the bargaining unit, in violation of section 3543.5(b) of EERA.

IV. REQUESTED REMEDIES

UTLA seeks an order requiring that LAUSD 1) cease and desist from interfering with the right of employees and UTLA under EERA; 2) promptly provide the complete information requested by UTLA on September 6, 2022; 3) promptly meet and confer with UTLA as demanded; 4) post notice of its unlawful conduct and that it has been directed to cease and desist from further such conduct, and that it will cease and desist from engaging in such conduct; and 5) any other appropriate relief.

EXHIBIT A

**BUSH GOTTLIEB
A Law Corporation**

David E. Ahdoot
Robert A. Bush PE
Adrian R. Butler
Hector De Haro
Lisa C. Demidovich #&
Erica Deutsch
Peter S. Dickinson +
Ira L. Gottlieb *
Julie Gutman Dickinson
Samantha M. Keng
Joseph A. Kohanski *
Adam Kornetsky #

801 North Brand Boulevard, Suite 950
Glendale, California 91203
Telephone (818) 973-3200
Facsimile (818) 973-3201
www.bushgottlieb.com

Dana S. Martinez
J. Paul Moorhead
Michael Plank
Kirk M. Prestegard
Dexter Rappleye
Ann Surapruik
Luke Taylor
Estephania Villalpando
Jason Wojciechowski &
Vanessa C. Wright
Sara Yufa

September 6, 2022

11250-32002

PE Partner Emeritus
* Also admitted in New York
+ Also admitted in Nevada
Also admitted in Washington DC
& Also admitted in Washington

Direct Dial: (818) 973-3220
ldemidovich@bushgottlieb.com

Devora Navera Reed, Esq.
Office of the General Counsel
Los Angeles Unified School District
333 S. Beaudry Ave.
Los Angeles, CA 90017

Re: UTLA Information Request

Dear General Counsel Reed:

We serve as General Counsel to United Teachers Los Angeles (UTLA). On behalf of UTLA, and under EERA, Gov't Code §§ 3540 *et seq.*, we request the following information necessary and relevant for enforcement of the collective bargaining agreement and for informing ongoing contract negotiations. Please provide the information responsive to the following requests to the undersigned by email at ldemidovich@bushgottlieb.com and igottlieb@bushgottlieb.com by Friday, September 16, 2022.

Vacancies and Rebalancing

1. Please provide the number of vacancies by job position in the UTLA bargaining unit for the District as of June 30, 2022.
2. Please provide the number of vacancies by job position in the UTLA bargaining unit for the District as of September 1, 2022.
3. Please provide a list by District school site or location of all positions in the UTLA bargaining unit which have been permanently vacated that are being temporarily filled, including the location, job position, who permanently vacated that position, who is temporarily filling that position, the job position in which the person served immediately before moving to the temporary position, whether the change in job positions was voluntary or involuntary, the anticipated length of the temporary assignment (if known), and any changes in wages or hours experienced by the person as a result of the temporary transfer.

Counseling Ratio

4. In Article XVIII, Section 5.0 of the LAUSD-UTLA CBA, the District agreed to “maintain a secondary counseling services ratio of 500-1 per secondary school” with “an additional secondary counselor” to be added once the “school has exceeded 50% of the ratio”. In order for UTLA to determine whether the District is in compliance with Article XVIII, Section 5.0 or whether a grievance may be warranted, please provide the following information for the current school year for each secondary school:

- a) the current student enrollment;
- b) the current number of budgeted counselor positions;
- c) the current number of permanently filled counselor positions;
- d) the current number of temporarily filled counselor positions;
- e) the current number of vacant counselor positions;
- f) the current number of temporarily vacant counselor positions due to reassignment; and
- g) the funding sources and corresponding dollar amount allocated for counseling positions in the 2022-2023 school year.

5. Please identify all steps taken at the District-wide level to ensure that the secondary school counseling services ratio of 500-1 per secondary school will be met by norm day in Fall 2022.

6. Because in the current negotiations UTLA has proposed counseling services ratios for all schools, please provide the following information for each non-secondary school:

- a) the current student enrollment;
- b) the current number of budgeted counselor positions;
- c) the current number of filled counselor positions;
- d) the current number of vacant counselor positions;
- e) the current number of temporarily vacant counselor positions due to reassignment; and
- f) the funding sources and corresponding dollar amount allocated for counseling positions for this school year.

School Nurses

7. Because in the current negotiations UTLA has made proposals to address recruitment and retention of school nurses, please provide the following information for each school:

- a) the current student enrollment;
- b) the current number of budgeted school nurse FTE positions;
- c) the current number of filled school nurse FTE positions;
- d) the current number of vacant school nurse positions;
- e) the current number of temporarily vacant school nurse positions due to reassignment; and

- f) the funding sources and corresponding dollar amount allocated for school nurse positions for this school year.

8. All compensation study or other economic data relied upon by the District in formulating its signing and retention bonuses for UTLA bargaining unit applicants and employees; if the District reviewed no data, please so indicate.

9. For each secondary school, please provide the number of school health clerks currently employed to support the School Nurses and the number of school health clerk budgeted positions.

10. Please identify all steps taken at the District-wide level to ensure that the school nurse ratios in the CBA will be met by norm day in Fall 2022.

Librarians

11. Because UTLA is concerned about changes to working conditions of librarians, please provide the following information for each school site:

- a) the current student enrollment;
- b) the current number of budgeted librarian positions;
- c) the current number of filled librarian positions;
- d) the current number of vacant librarian positions;
- e) the current number of temporarily vacant librarian positions due to reassignment; and
- f) the funding sources and corresponding dollar amount allocated for librarian positions for this school year.

12. Please identify all steps taken at the District-wide level to ensure that the budgeted librarian positions will be filled by norm day in Fall 2022.

Special Education

13. Because UTLA is concerned about compliance about changes to working conditions of teachers in special education, please provide the following information for each school site:

- a) the current student enrollment for students eligible to receive special education services;
- b) the current number of budgeted special education classroom teaching positions;
- c) the current number of filled special education classroom teaching positions;
- d) the current number of vacant special education classroom teaching positions;
- e) the current number of temporarily vacant special education classroom teaching positions due to reassignment; and
- f) the funding sources and corresponding dollar amount allocated for special education classroom teaching positions for this school year.

September 6, 2022

Page 4

District Assessments

14. During a meeting between UTLA and the District on Friday, August 12, Superintendent Carvalho informed UTLA that the District is conducting an audit to determine the number and type of standardized tests being used in every school by local district. By email to Kristen Murphy on August 17, Jeff Good formally requested the results of this audit, as well as the date by which it will be completed and the date by which UTLA will receive the results. To date, the District has not advised of the completion or the expected date of completion. Please provide that outstanding information UTLA requested on August 17.

UTLA reserves all rights to supplement this information request. Thank you.

Very truly yours,

Bush Gottlieb
A Law Corporation



Lisa C. Demidovich



Ira L. Gottlieb

cc: UTLA President Cecily Myart-Cruz
UTLA Executive Director Jeff Good
Dr. Kristen Murphy, Chief Employee Support & Labor Relations
Tony DiGrazia, Director Office of Labor Relations

EXHIBIT B

From: Jeff Good

Sent: Friday, September 16, 2022 5:48 PM

To: Murphy, Kristen <kristen.murphy@lausd.net>; DiGrazia, Anthony <anthony.digrazia@lausd.net>; Robert (contract articles)Samples <robert.samples@lausd.net> <robert.samples@lausd.net>

Cc: Gloria Martinez <gmartinez@utla.net>; Arlene Inouye <ainouye@utla.net>; Julie Van Winkle <julie.vanwinkle@utla.net>

Subject: Reassignments

Hi Kristen & Team-We hereby demand to meet and confer over the district's unilateral reassignment of UTLA bargaining unit members and the resulting impact on working conditions for our entire bargaining unit.

Gloria Martinez will be point for UTLA in this process.

Our request is obviously urgent, so please provide Gloria with three potential dates and times for meeting next week as soon as possible.

Thanks-JG

Jeff Good

UTLA Executive Director

213-487-5560

jgood@utla.net



**UNITED TEACHERS
LOS ANGELES**

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EXHIBIT C

From: Jeff Good

Sent: Friday, September 16, 2022 5:40 PM

To: Gonez, Kelly <kelly.gonez@lausd.net>

Cc: jackie.goldberg@lausd.net; nick.melvoin@lausd.net; monica.garcia@lausd.net; george.mckenna@lausd.net; Schmerelson, Scott M. <scott.schmerelson@lausd.net>; tanya.ortizfranklin@lausd.net; Carvalho, Alberto <alberto.carvalho@lausd.net>; Murphy, Kristen <kristen.murphy@lausd.net>; DiGrazia, Anthony <anthony.digrazia@lausd.net>; Cecily Myart-Cruz <cmyardcruz@utla.net>; Arlene Inouye <ainouye@utla.net>; Gloria Martinez <gmartinez@utla.net>; Julie Van Winkle <julie.vanwinkle@utla.net>; Alex Caputo Pearl <acaputopearl@utla.net>; Alex Orozco <aorozco@utla.net>; Juan Ramirez <jramirez@utla.net>

Subject: LAUSD has vacancies and we need information

Hello Board of Education President Gonez,
Please see the attached request for information.

As of today these requests have not been accommodated despite the urgency of a situation that's creating chaos on campuses and severely damaging the morale of educators. Educators are being reassigned without being told how long the reassignment will continue, educators are having previously approved reassignments and transfers blocked without being told how long the block will continue, and out of classroom educators are being assigned to classroom teaching assignments while being asked to continue doing elements of their previous job.

While recognizing that some of this dislocation has been caused by an historic shortage of educators resulting from decades of poor pay, increasingly unhealthy working conditions, and political abuse of the profession, the district has added insult to injury by repeatedly claiming in the media that there are no "teacher" vacancies in LAUSD. This verbal subterfuge is shamefully short sighted and dishonest, ultimately inspiring distrust among all stakeholders when we can least afford it.

For these reasons and more, UTLA calls on you and the Board to direct the superintendent to accommodate the attached information request immediately. Furthermore, we demand to be provided with some kind of "plan" for our members and the community to know how and when this reassignment debacle will be rectified. The lack of communication by the district with employees who've been unceremoniously lifted from the job they thought they had is simply stunning.

Finally, we call on the Board and the superintendent to stop saying there are no vacancies. If you're moving Community School coordinators or BSAP Restorative Justice advisors to cover classes because there isn't a teacher, THEN YOU HAVE VACANCIES. If your Special Education caseloads exceed contractual caps because you don't have enough Special Education providers, THEN YOU HAVE VACANCIES. If you're moving educators assigned to Beaudry or local district offices to cover classes because there isn't an available teacher, THEN YOU HAVE VACANCIES.

Thanks-JG

Jeff Good
UTLA Executive Director

213-487-5560
jgood@utla.net



**UNITED TEACHERS
LOS ANGELES**

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**BUSH GOTTLIEB
A Law Corporation**

David E. Ahdoot
Robert A. Bush PE
Adrian R. Butler
Hector De Haro
Lisa C. Demidovich #&
Erica Deutsch
Peter S. Dickinson +
Ira L. Gottlieb *
Julie Gutman Dickinson
Samantha M. Keng
Joseph A. Kohanski *
Adam Kornetsky #

801 North Brand Boulevard, Suite 950
Glendale, California 91203
Telephone (818) 973-3200
Facsimile (818) 973-3201
www.bushgottlieb.com

Dana S. Martinez
J. Paul Moorhead
Michael Plank
Kirk M. Prestegard
Dexter Rappleye
Ann Surapruik
Luke Taylor
Estephania Villalpando
Jason Wojciechowski &
Vanessa C. Wright
Sara Yufa

September 6, 2022

11250-32002

PE Partner Emeritus
* Also admitted in New York
+ Also admitted in Nevada
Also admitted in Washington DC
& Also admitted in Washington

Direct Dial: (818) 973-3220
ldemidovich@bushgottlieb.com

Devora Navera Reed, Esq.
Office of the General Counsel
Los Angeles Unified School District
333 S. Beaudry Ave.
Los Angeles, CA 90017

Re: UTLA Information Request

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Counseling Ratio

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- g) the funding sources and corresponding dollar amount allocated for counseling positions in the 2022-2023 school year.

5. Please identify all steps taken at the District-wide level to ensure that the secondary school counseling services ratio of 500-1 per secondary school will be met by norm day in Fall 2022.

6. Because in the current negotiations UTLA has proposed counseling services ratios for all schools, please provide the following information for each non-secondary school:

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School Nurses

7. Because in the current negotiations UTLA has made proposals to address recruitment and retention of school nurses, please provide the following information for each school:

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- f) the funding sources and corresponding dollar amount allocated for school nurse positions for this school year.

8. All compensation study or other economic data relied upon by the District in formulating its signing and retention bonuses for UTLA bargaining unit applicants and employees; if the District reviewed no data, please so indicate.

9. For each secondary school, please provide the number of school health clerks currently employed to support the School Nurses and the number of school health clerk budgeted positions.

10. Please identify all steps taken at the District-wide level to ensure that the school nurse ratios in the CBA will be met by norm day in Fall 2022.

Librarians

11. Because UTLA is concerned about changes to working conditions of librarians, please provide the following information for each school site:

- a) the current student enrollment;
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- c) the current number of filled librarian positions;
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- f) the funding sources and corresponding dollar amount allocated for librarian positions for this school year.

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Special Education

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- d) the current number of vacant special education classroom teaching positions;
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September 6, 2022

Page 4

District Assessments

14. During a meeting between UTLA and the District on Friday, August 12, Superintendent Carvalho informed UTLA that the District is conducting an audit to determine the number and type of standardized tests being used in every school by local district. By email to Kristen Murphy on August 17, Jeff Good formally requested the results of this audit, as well as the date by which it will be completed and the date by which UTLA will receive the results. To date, the District has not advised of the completion or the expected date of completion. Please provide that outstanding information UTLA requested on August 17.

UTLA reserves all rights to supplement this information request. Thank you.

Very truly yours,

Bush Gottlieb
A Law Corporation



Lisa C. Demidovich



Ira L. Gottlieb

cc: UTLA President Cecily Myart-Cruz
UTLA Executive Director Jeff Good
Dr. Kristen Murphy, Chief Employee Support & Labor Relations
Tony DiGrazia, Director Office of Labor Relations

EXHIBIT D

From: Jeff Good

Sent: Friday, September 30, 2022 8:39 AM

To: Murphy, Kristen <kristen.murphy@lausd.net>; DiGrazia, Anthony <anthony.digrazia@lausd.net>; Robert (contract articles)Samples (robert.samples@lausd.net) <robert.samples@lausd.net>

Cc: Gloria Martinez <gmartinez@utla.net>; Arlene Inouye <ainouye@utla.net>; Julie Van Winkle <julie.vanwinkle@utla.net>

Subject: SPED & Reassignment Issues

Hi Kristen-UTLA hereby demands to bargain the impact & effects of the recent “hacking” of the district’s data and information systems on the working conditions of Special Education providers. Gloria Martinez will be point for UTLA in this process.

Additionally, per the email below, we made a demand to meet and confer over the district’s unilateral reassignment of UTLA bargaining unit members on September 16 but have yet to receive a response. Gloria Martinez will also be point for UTLA in this process.

Both requests are urgent, so please provide Gloria with three potential dates and times for meeting next week by the end of today.

Thanks-JG

Jeff Good

UTLA Executive Director

213-487-5560

jgood@utla.net



**UNITED TEACHERS
LOS ANGELES**

From: Jeff Good

Sent: Friday, September 16, 2022 5:48 PM

To: Murphy, Kristen <kristen.murphy@lausd.net>; DiGrazia, Anthony <anthony.digrazia@lausd.net>; Robert (contract articles)Samples (robert.samples@lausd.net) <robert.samples@lausd.net>

Cc: Gloria Martinez <gmartinez@utla.net>; Arlene Inouye <ainouye@utla.net>; Julie Van Winkle <julie.vanwinkle@utla.net>

Subject: Reassignments

Hi Kristen & Team-We hereby demand to meet and confer over the district's unilateral reassignment of UTLA bargaining unit members and the resulting impact on working conditions for our entire bargaining unit.

Gloria Martinez will be point for UTLA in this process.

Our request is obviously urgent, so please provide Gloria with three potential dates and times for meeting next week as soon as possible.

Thanks-JG

Jeff Good

UTLA Executive Director

213-487-5560

jgood@utla.net



**UNITED TEACHERS
LOS ANGELES**

Please consider the environment before printing this email.

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PROOF OF SERVICE

I declare that I am a resident of or employed in the County of Los Angeles,
State of California. I am over the age of 18 years. The name and address of my
Residence or business is Bush Gottlieb, A Law Corporation
801 N. Brand Blvd., Ste. 950, Glendale, CA 91203

On October 5, 2022, I served the Unfair Practice Charge
(Date) (Description of document(s))

_____ in Case No. _____
(Description of document(s) continued) PERB Case No., if known)

on the parties listed below by (check the applicable method(s)):

- placing a true copy thereof enclosed in a sealed envelope for collection and delivery by the United States Postal Service or private delivery service following ordinary business practices with postage or other costs prepaid;
- personal delivery;
- electronic service - I served a copy of the above-listed document(s) by transmitting via electronic mail (e-mail) or via e-PERB to the electronic service address(es) listed below on the date indicated. (May be used only if the party being served has filed and served a notice consenting to electronic service or has electronically filed a document with the Board. See PERB Regulation 32140(b).)

(Include here the name, address and/or e-mail address of the Respondent and/or any other parties served.)

Kristen Murphy
Chief of Employee Support & Labor
Relations
3303 Wilshire Blvd., 10th Floor
Los Angeles, CA 90010
E-Mail: Kristen.Murphy@lausd.net

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct and that this declaration was executed on October 5, 2022,
(Date)
at Glendale, California.
(City) (State)

Ian Zulueta



(Type or print name)

(Signature)