

May 30, 2014

Ricky J. Poole  
The Law Offices of Ricky J. Poole  
The Forum Building  
8000 IH10 West, Suite 600  
San Antonio, Texas 78230

RECEIVED  
CITY MANAGER'S OFFICE  
2014 MAY 30 PM 4:37

Dear Mr. Poole,

Jeff Londa and I are the co-chief negotiators for the City of San Antonio's collective bargaining with the International Association of Fire Fighters Local 624, and all future correspondence from you and the Union should be sent to us. We are writing on behalf of the City regarding scheduling of collective bargaining. As you may know, the City has communicated several times with Mr. Steele, on February 19, March 4, March 13, March 24 and again on April 4, requesting the Union to set a date to commence negotiations for a new collective bargaining agreement. To date, Mr. Steele and the Union have refused to schedule any collective bargaining negotiations, despite the City's requests.

Even though the current collective bargaining agreement may have relieved the Union from providing the City 120 days' notice under Section 174.107 of the Texas Local Government Code, neither the collective bargaining agreement nor the statute permits the Union to refuse to engage in collective bargaining as is evidenced by Section 174.105's mandate that the City and the Union *shall* bargain in good faith. The statute further requires, in Section 174.105(b) (1), that the parties *shall* meet at reasonable times, something the Union has been unwilling to do thus far.

The City's primary goal in collective bargaining is to discuss and effectuate changes to the Fire Department employees' healthcare and other benefits and costs. However, the Union's refusal to schedule any collective bargaining meetings to date has resulted in no progress being made, even though the City's Fiscal Year 2014-15 annual budget preparations are well underway and must be completed by September, 2014. As of June 3, the parties are 120 days from the end of the 2013-2014 Fiscal Year. It is time to begin negotiating. It would be unreasonable for the Union to continue to refuse to negotiate. Please contact us by June 6 about a suggested date to commence collective bargaining. Mr. Londa can be reached at 713.655.5750 (office) or 713.240.3434 (cell) or via e-mail at [Jeff.Londa@ogletreedeakins.com](mailto:Jeff.Londa@ogletreedeakins.com). My contact information is below.

Very Truly Yours,



Bettye Lynn  
[Lynn@laborcounsel.net](mailto:Lynn@laborcounsel.net)  
817.332.8504

Cc: Jeff Londa  
Chris Steele

