



SENT VIA FAX AND USPS

August 20, 2018

Richard P. Gilardi, Esq.  
GILARDI, CLIVEN & LOMUPO, P.A.  
233 Fourth Avenue, 10<sup>th</sup> Floor  
Pittsburgh, PA 15222

Dear Mr. Gilardi:

This is in response to your letter dated August 8, 2018. I apologize for not responding sooner, I was out of the office.

CWA still has important questions that need to be answered before it can even consider arbitration. Until such time as those questions are answered, CWA believes the filing of a "Compliant to Compel Arbitration" is premature.

In my letter of June 26, 2018, I stated:

More importantly, however, CWA needs to better understand who you represent. The 2011 "PPMWS Agreement" was entered into by the "Laws and Finance Committee of the PPMWS." It is unclear from your letter whether you, in fact, represent the "Laws and Finance Committee." The demand for arbitration names "PPMWS of the CWA" as the name of the party filing the demand and also names the "PPMWS" as the grievant.

In addition, the 2011 "PPMWS Agreement" names Laws and Finance Committee as the "executive committee on all matters pertaining to the PPMWS." It is not clear whether the Laws and Finance Committee has authorized the arbitration demand or whether the Laws and Finance Committee is the party seeking arbitration.

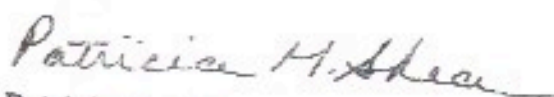
You have not responded to that letter. At the very least, CWA needs to understand who your client is and also needs to understand who would be a party to any arbitration. CWA needs answers to these questions in order to

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determine whether any conflicts of interest exist and whether the demand for arbitration is appropriate in any event.

Please advise at your earliest convenience as to these matters.

Sincerely,



Patricia M. Shea  
General Counsel

cc: Chris Shelton  
Aincenah Salaam  
George Eohl  
Jody Calemine