

June 7, 2019

Professional Distinction

Personal Dignity

Patient Advocacy

Mark Nordby
Director of Employee and Labor Relations
Park Nicollet-Methodist Hospital
6500 Excelsior Blvd
Saint Louis Park, MN 55426

VIA USPS and E-Mail: Mark.Nordby@ParkNicollet.com

Dear Mr. Nordby,

In an email sent out by Kasey Paulus Vice President, Inpatient Care Services Chief Nursing Officer for Methodist Hospital on June 5, 2019 at 5:38 p.m., Ms. Paulus made claims regarding obligations to replacement nurses and the contracts the employer may have with these replacement nurses. The Union is concerned about the nature of these contracts based on this statement by Ms. Paulus:

"If you are asked to vote for a one-day strike, it doesn't necessarily mean you will lose only one day of work/pay. Methodist hospital has a contractual commitment with temporary nurse vendors requiring us to pay five days of wages to the replacement nurses. Additionally, the timing of returning to work following a strike depends on multiple factors, including patient care needs due to a reduced patient census or unit closures."

In order to examine these claims and to effectively make and evaluate proposals and counterproposals in negotiations, we seek certain information. Please provide for the following data in seven (7) days.

1. A list of all individuals who have been contracted to provide temporary help in the event of a potential strike in 2019, including their name, address, phone number, and email address. We contend that under Georgetown Holiday Inn (235 NLRB 485), the employer is obligated to provide this information.
2. A true and correct copy of the contract with the agency or agencies that are providing the replacement nurses referenced in the June 5, 2019 communication to employees.
3. Any and all documents relating in any way to the negotiation of the agreement(s) referenced in the communication to employees regarding replacement nurses. This request is intended to encompass, but is not limited to, correspondence, notes, emails, drafts, proposals, counterproposals, memoranda, and any other writing between employees, agents, and/or representatives of Methodist Hospital and the agency or agencies with whom the agreement was made.
4. Any and all documents relating in any way to the negotiation of a potential agreement(s) with regard to provision of replacement nurses on or after June 1, 2019 with an agency which provides replacement nurses. This

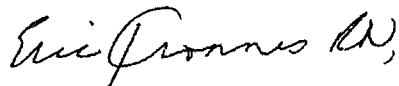
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5. request is intended to encompass, but is not limited to, correspondence, notes, emails, drafts, proposals, counterproposals, memoranda, and any other writing between employees, agents, and/or representatives of Methodist Hospital and the agency or agencies with whom the agreement was made.
6. True and correct copies of any and all contract with any temporary employment agency for the provision of registered nurses that Park Nicollet Methodist Hospital has entered into at any time within the past five years.
7. Copies of all written plans Methodist Hospital may have to reduce patient census or close units in the event that MNA conducts a limited duration strike. This information is necessary as the employer has asserted in communication to the bargaining unit, they may need to lock out nurses for more than the five days as required by the employer's contracts due to census reductions or unit closures.

Sincerely,



Eric Tronnes
MNA Labor Relations Specialist

Cc: Methodist MNA Negotiation Team
Joel Van Horn, MNA Organizer
Travis Thibodeau, MNA Organizer