

1.

**ADDITIONS, CORRECTIONS OR DELETIONS  
PLEASE ANSWER AND RETURN IN 5 DAYS.**

GRIEVANCE # C-4-7-04 NAME Wilson, Melinda <sup>Notice of Removal</sup>  
DATE 4-28-04 SENT TO STP3 4-28-04

**ANSWER TO MGMTS STEP 2 ANSWER:**

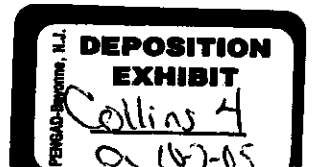
Mr. Andrew Keen's letter of denial dated 4-27-04, clearly cites what the grievance is untimely. Citing what the Notice of Removal was delivered to Ms Wilson's address of record on 3-30-04. The evidence is by the slotting letter signed

**CORRECTIONS:** by the letter carrier who attests what the first class letter was delivered to Ms Wilson's address at 1:21 pm on 3/30/04.

**DELETIONS:** The Union contends what by the letter carrier signing a slotting letter is no proof

SIGNATURE [Signature]  
4-28-04

A-000223



2.

**ADDITIONS, CORRECTIONS OR DELETIONS  
PLEASE ANSWER AND RETURN IN 5 DAYS.**

GRIEVANCE # C14-7-04 NAME Wilson, M

DATE 4-28-04 SENT TO STP3 4-28-04

**ANSWER TO MGMTS STEP 2 ANSWER:**

or verification that Ms Wilson  
was at home on 3/30/04, at  
1:21pm, to receive her Notice of  
Removal. Mr. Keen failed to produce  
as evidence PS Form 3811, with  
Ms Wilson's signature. The  
Union has no knowledge of this

**CORRECTIONS:**

letter carrier even went  
to the right address) on 3/30/04  
However, there is evidence that  
on 4-6-04, Ms. Wilson sign for

**DELETIONS:**

Item # 7003-1010-0001-1223-5956  
at 14:03. Therefore the step 1  
filed on 4-6-04, clearly makes

SIGNATURE

D. Simon  
4-28-04

**A-000224**

3.

**ADDITIONS, CORRECTIONS OR DELETIONS  
PLEASE ANSWER AND RETURN IN 5 DAYS.**

GRIEVANCE # CL4-7-04 NAME Wilson, M

DATE 4-28-04 SENT TO STP3 4-28-04

**ANSWER TO MGMTS STEP 2 ANSWER:**

CL 4-07-04, timely. The Union concurs  
mgmt's argument has no merit.  
The Union at step II has great  
concerns about mgmt. issuing  
Ms Wilson a Notice of Removal  
in an untimely manner. The  
Notice of Removal clearly cites

CORRECTIONS: the dates of 11-5-03, 12-5-03,  
12-12-03, 12-18-03, 12-19-03, 12-20-03, how-

ever, mgmt. issued Ms Wilson a  
Notice of Removal on 4-6-04.

DELETIONS clearly cite type of actions  
by mgmt. in an untimely and punitive  
in nature. The Union strongly

SIGNATURE S. Simon  
4-28-04

A-000225

4.

**ADDITIONS, CORRECTIONS OR DELETIONS  
PLEASE ANSWER AND RETURN IN 5 DAYS.**

GRIEVANCE # CL4-7-04 NAME Wilson, M.

DATE 4-28-04 SENT TO STP3 4-28-04

**ANSWER TO MGMTS STEP 2 ANSWER:**

Content what much of Mr. Keen's  
letter of denial lacked merit.  
The Union contends that  
mgmt. had issued a Notice  
of Removal based on dates  
that M. Wilson suffered  
chronic asthma attacks. The

**CORRECTIONS:** FMLA documents are filed  
in Larry Buccia's office. Mr.  
Buccia is the FMLA coordinator  
for mgmt. Mgmt. can not ~~delete~~

**DELETIONS:** discipline an employee for  
utilizing FMLA when accepted on  
file. Mr. Keen also claims that

SIGNATURE [Signature]

4-28-04

**A-000226**

5

**ADDITIONS, CORRECTIONS OR DELETIONS  
PLEASE ANSWER AND RETURN IN 5 DAYS.**

GRIEVANCE # 014-7-04 NAME Wilson, M

DATE 4-28-04 SENT TO STP 34-28-04

**ANSWER TO MGMTS STEP 2 ANSWER:**

as of 4-27-04, Miss Wilson  
is still on Administrative Leave  
pending the effective date of  
the removal and has not  
received any money or benefits to  
date. Further he states the  
Union's requested remedy of  
**CORRECTIONS:** should be made  
whole, is non-specific. The  
Union is specifically stating  
that once the administrative

**DELETIONS:** Leave comes to an end.  
Ms Wilson will still be  
left on the rolls in a non-

SIGNATURE T. Stinson

4-28-04

**A-000227**

**ADDITIONS, CORRECTIONS OR DELETIONS  
PLEASE ANSWER AND RETURN IN 5 DAYS.**

GRIEVANCE # CL 4-7-04 NAME Wilson, M.

DATE 4-28-04 SENT TO STP3 4-28-04

**ANSWER TO MGMTS STEP 2 ANSWER:**

pay status. Under the final  
act - come set forth by an  
arbitrator. With hopeful resolu-  
-tion of remedy in favor of  
the Union. Ms Wilson will  
receive all lost pay and  
benefits to date of award

**CORRECTIONS:** for CL 4-7-04. Mr.

Keen states in his ~~last~~ ref  
to last paragraph "No con-  
-ventions other than those

**DELETIONS:** discussed in this response  
were provided at step 2 hearing.

This statement is also lacking  
S. J. Wilson

SIGNATURE S. J. Wilson

4-28-04

A-000228

6A

**ADDITIONS, CORRECTIONS OR DELETIONS  
PLEASE ANSWER AND RETURN IN 5 DAYS.**

GRIEVANCE # CL4-7-04 NAME Wilson, M.

DATE 4-28-04 SENT TO STP3 4-28-04

ANSWER TO MGMTS STEP 2 ANSWER:

in merit. The Union and mgmt.  
never held any discussion about  
Case files grievances 04084651, 040-  
70115, or 04053770. On page 3 of  
Mr. Keen's letter first paragraph  
Mr. Keen states, "the union contends  
violations of article 17 and 31 are

CORRECTIONS:

Rejected. The parties at  
Step 2, indigenized the docu-  
ments in the grievance file  
and agreed that all information

DELETIONS:

was provided as part of  
this grievance. The Union strongly  
disagrees with the corrections.

SIGNATURE

B. Jensen

4-28-04

**A-000229**

7

**ADDITIONS, CORRECTIONS OR DELETIONS  
PLEASE ANSWER AND RETURN IN 5 DAYS.**

GRIEVANCE # CL 4-7-04 NAME Wilson, M.

DATE 4-28-04 SENT TO STP 34-28-04

**ANSWER TO MGMTS STEP 2 ANSWER:**

Concedes that this is true.

No where in our exchange of  
documents for this grievance was  
the phrase by mgmt. a su-  
vestigative memorandum (IM).  
Mr. Dean and Mr. Einson never  
held any discussion at step II or

**CORRECTIONS:** 4-23-04, about any  
postal inspection service con-  
ducting an investigation into  
Ms Wilson's conduct etc...

**DELETIONS:** Therefore, mgmt argume-  
nts on this issue must be  
waived. The Union has great

**SIGNATURE:** [Signature]

4-28-04

**A-000230**



8.

**ADDITIONS, CORRECTIONS OR DELETIONS  
PLEASE ANSWER AND RETURN IN 5 DAYS.**

GRIEVANCE # CL4-7-04 NAME Wilson M

DATE 4-28-04 SENT TO STP3 4-28-04

ANSWER TO MGMTS STEP 2 ANSWER:

suspicion surrounding the  
disciplinary interview (day in  
court) documents dated  
3-10-04, at 7:40am. There are

two dated forms with  
no mention of infractions. Ms

CORRECTIONS:

Defendant writes see  
attached. Questions are already  
allegedly typed in advance  
as well as answers. Miss Dummer

DELETIONS:

never submitted any writing  
notes to support or substantiate  
exactly what Ms Wilson stated

SIGNATURE

[Signature]

4-28-04

A-000231

9.  
1

**ADDITIONS, CORRECTIONS OR DELETIONS  
PLEASE ANSWER AND RETURN IN 5 DAYS.**

GRIEVANCE # CL4-7-04 NAME Wilson, R J

DATE 4-28-04 SENT TO STP3 4-28-04

ANSWER TO MGMTS STEP 2 ANSWER:

during her day in court on  
3-10-04 at 7:40 Am. Mgmt. at  
step I and II never produce  
any hand written response  
from the disciplinary interview  
(day in court). As of 4-28-04,  
no documentation on the above

CORRECTIONS: aforementioned has been  
provided. The documents type  
for the pre-disciplinary interview  
are not dated. The union

DELETIONS: Contents of that mgmt.  
producing documents not dated  
for issuing an employee a NOR

SIGNATURE R. J. Wilson

4-28-04

**A-000232**

10.

**ADDITIONS, CORRECTIONS OR DELETIONS  
PLEASE ANSWER AND RETURN IN 5 DAYS.**

GRIEVANCE # C44-7-04 NAME Wilson M.

DATE 4-28-04 SENT TO STP3 4-28-04

ANSWER TO MGMTS STEP 2 ANSWER:

had great weight vs raise the  
flag of concern by the  
Union for defending exactly  
what was presented by [unclear]  
and what was exactly the  
response of the employee on  
3/10/04, cited on the day in

CORRECTIONS: Court interview. The  
day in Court document from  
the very beginning of the  
interview. [unclear]'s de-

DELETIONS: Cision (what action is going  
to be taken) Removal of  
PTs Wilson's OPF and superior

SIGNATURE [Signature]

4-28-04

**A-000233**

11.

**ADDITIONS, CORRECTIONS OR DELETIONS  
PLEASE ANSWER AND RETURN IN 5 DAYS.**

GRIEVANCE # CL 4-7-04 NAME (Wilson, J)

DATE 4-28-04 SENT TO STP3 4-28-04

**ANSWER TO MGMTS STEP 2 ANSWER:**

elements citing any improper  
conduct. As of 4-28-04, the  
union contends that mgmt.  
is in violation of articles 2, 5,  
15, 16, 17, 19, 30, 31, of the EL-921, FRIKA.  
When mgmt issued the grievant  
a removal for unjust cause, the

**CORRECTIONS:** Notice of Removal is proced-  
urally defective, absolutely  
unlawful, punitive rather than  
corrective in nature, non-pro-

**DELETIONS:** grossing, disparity in tre-  
atment and in direct violation  
of the EL-921. Ms Wilson's

SIGNATURE V.S. Wilson

4-28-04

**A-000234**

12.

**ADDITIONS, CORRECTIONS OR DELETIONS  
PLEASE ANSWER AND RETURN IN 5 DAYS.**

GRIEVANCE # CL 4-7-04 NAME Wilson, M

DATE 4-28-04 SENT TO STP3 4-28-04

**ANSWER TO MGMTS STEP 2 ANSWER:**

Has a medical condition which  
at times she becomes sick  
and takes medical treatment  
that makes her feel better  
and able to work at times.

The removal is in violation  
of article 16.1 - the principles

**CORRECTIONS:** of discipline. Ms Wil-  
-son has no past discipline  
or discussion on this issue.

Miss Wilson's was not given

**DELETIONS:** a proper day in Court,  
but instead went to see a  
interceptor. During the DIC.

SIGNATURE H. Stinson

4-28-04

**A-000235**

13.

**ADDITIONS, CORRECTIONS OR DELETIONS  
PLEASE ANSWER AND RETURN IN 5 DAYS.**

GRIEVANCE # 4-7-04 NAME Wilson, R

DATE 4-28-04 SENT TO STP 4-28-04

ANSWER TO MGMTS STEP 2 ANSWER:

Ms Wilson was never pre-  
sentenced with 3971's for dates  
she had been accused of. So,  
Ms Wilson could rebut  
questions and take reasons  
of her reply "I don't know  
was given" as a major reason

CORRECTIONS:

for her response with  
lack of mgmt's 3971 evidence.  
This is a clear violation of  
the FL-921. Evidence must

DELETIONS:

be presented to the  
grand jury during a day in court.  
The Notice of Removal is flawed

SIGNATURE

R. Wilson

4-28-04

**A-000236**

14.

**ADDITIONS, CORRECTIONS OR DELETIONS  
PLEASE ANSWER AND RETURN IN 5 DAYS.**

GRIEVANCE # CL4-7-04 NAME Wilson, 177

DATE 4-28-04 SENT TO STP3 4-28-04

**ANSWER TO MGMTS STEP 2 ANSWER:**

and Capricious (has) not pro-  
-gressive or corrective. A dis-  
-cussion could have avoided  
this issue. This issue of issu-  
-ing Ms Wilson a notice of  
removal started after the  
grievant stopped having an

CORRECTIONS: affair with the  
Employee Labor Retention Specia-  
-list located at the same  
work place of the grievant.

DELETIONS: Which is why Mr. Keeney  
has been working from the  
lead plant in Belmont, NJ.

SIGNATURE A. Simon

4-28-04

**A-000237**

15.

**ADDITIONS, CORRECTIONS OR DELETIONS  
PLEASE ANSWER AND RETURN IN 5 DAYS.**

GRIEVANCE # 024-7-04 NAME Wilson, M

DATE 4-28-04 SENT TO STP3 4-28-04

**ANSWER TO MGMTS STEP 2 ANSWER:**

to address only. Ms Wilson's  
grievances that have been filed  
since December 24, 2003.  
Mgmt. Keen is well aware  
of your alledge cited affair  
and legal proceedings cur-  
rently in place between Ms Wil-

**CORRECTIONS:**

son and mgmt. as  
of 4-28-04. The MGO also was  
involved in the investigation  
of this case and also was the

**DELETIONS:**

Concurring official. This  
is also a direct violation  
of the CBA and EL-921.

SIGNATURE

S. Simon

4-28-04

**A-000238**



16.

**ADDITIONS, CORRECTIONS OR DELETIONS  
PLEASE ANSWER AND RETURN IN 5 DAYS.**

GRIEVANCE # CL 4-7-04 NAME Wilson, M.

DATE 4-28-04 SENT TO STP3 4-28-04

**ANSWER TO MGMTS STEP 2 ANSWER:**

The Union contends at step II  
where, was no impartial desc-  
ision made and Mr Wilson  
never stood a chance of having  
a fair day in court.  
This discipline came from the  
top in the structure in vio-

**CORRECTIONS:** violation of the CBA and  
FL-321, Article 16.1, clearly  
lays out the just cause pro-  
visions for termination. This

**DELETIONS:** Case does not warrant  
int. progression must be used.  
The corrective action must be sustained

SIGNATURE S. Thurman in full.  
4-28-04 A-000239