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October 28, 2013

Public Employment Relations Board
1330 Broadway, Ste. 1532
Oakland, CA 94612-2514

Re: SEIU Local 521's Fact-Finding Request
Service Employees International Union, Local 521 and County of San Benito.

The undersigned are counsel for the Service Employees International Union, Local 521 ("SEIU") and the County of San Benito ("County"). Specifically, Sean Graham of Weinberg Roger & Rosenfeld represents SEIU and Dania Torres Wong of Renne Sloan Holtzman & Sakai represents the County. The undersigned submit this letter in conjunction with the request for fact-finding made by the SEIU. Pursuant to an agreement between the SEIU and the County, the parties request that PERB designate November 17, 2013 as the date by which the parties must identify their respective panel members and any agreed-upon fact-finder. Counsel are available to answer any questions PERB may have regarding the request for fact-finding and this letter.

Sean Graham may be reached at sgraham@unioncounsel.net or 213.380.2344.

Dania Torres Wong may be reached at dtorreswong@publiclawgroup.com or 415.678.3834.

Respectfully submitted,

SEAN D. GRAHAM

Weinberg Roger & Rosenfeld
Attorneys for SEIU LOCAL 521

DANIA TORRES WONG

Renne Sloan Holtzman & Sakai
Attorneys for COUNTY OF SAN BENITO



MMBA FACTFINDING REQUEST

DO NOT WRITE IN THIS SPACE: Case No.:

Date Filed:

INSTRUCTIONS: A request for factfinding pursuant to Government Code section 3505.4 must be filed with the appropriate regional office (see PERB Regulation 32075). Proof of service must accompany the request.

1. EMPLOYER

Name: County of San Benito
Address: 481 4th St., 1st Floor
Hollister, CA 95023-3840

Agent to be contacted:

Name: Dania Torres Wong
Title: Attorney
Agency/Law Firm: Renne Sloan Holtzman & Sakai
Address: 350 Sansome Street, Suite 300
San Francisco, CA 94104
Phone: 415.678.3834
E-mail Address: dtorreswong@publiclawgroup.com

2. EXCLUSIVE REPRESENTATIVE

Name: SEIU Local 521
Address: 334 Monterey Street
Salinas, CA 93901

Agent to be contacted:

Name: Sean D. Graham
Title: Attorney
Union/Law Firm: Weinberg Roger & Rosenfeld
Address: 800 Wilshire Blvd., Ste. 1320
Los Angeles, CA 90017-2607
Phone: 213.380.2344
E-mail Address: sgraham@unioncounsel.net

3. TITLE/DESCRIPTION OF ESTABLISHED UNIT

General Unit

4. TYPE OF DISPUTE (e.g., initial contract, successor contract, reopeners, effects of layoff, other)

successor contract

5. STATUS OF NEGOTIATIONS/MEET AND CONFER

- (a) Date impasse was declared by a party/parties: County declared impasse on October 8, 2013
- (b) Date a mediator was appointed (if applicable):

DECLARATION

The parties have been unable to effect a settlement. Therefore, pursuant to PERB Regulation 32802, we request that the parties' differences be submitted to a factfinding panel.

NAME OF AUTHORIZED REPRESENTATIVE: Sean D. Graham

SIGNATURE OF AUTHORIZED REPRESENTATIVE: 

Title: Weinberg Roger & Rosenfeld, attorneys for SEIU

Date: ~~10/28/2013~~ 10/28/2013

(Attach a completed Proof of Service form.)

Los Angeles Regional Office
700 N. Central Avenue, Suite 200
Glendale, CA 91203-3219
(818) 551-2822

Sacramento Regional Office
1031 18th Street
Sacramento, CA 95814-4174
(916) 322-3198

San Francisco Regional Office
1330 Broadway, Suite 1532
Oakland, CA 94612-2514
(510) 622-1016

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 800 Wilshire Boulevard, Los Angeles, CA 90017

On October 28, 2013, I served the Letter to PERB re SEIU Local 521's
(Date) (describe document(s))

Fact-Finding Request; and, MMBA Factfinding Request

on the parties listed below (include name, address and, where applicable, fax number) by (check
the applicable method or methods):

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;


facsimile transmission in accordance with the requirements of PERB Regulations
32090 and 32135(d).

Dania Torres Wong, Esq.
Renne, Sloan, Holtzman & Sakai
350 Sansome Street, Suite 300
San Francisco, CA 94104

I declare under penalty of perjury that the foregoing is true and correct and that this
declaration was executed on October 28, 2013, at Los Angeles, California.

Guadalupe Issa

(Type or print name)


(Signature)