RICHARD J. WYLIE, 1933-2018 MARK S. RENNER, Retired JOHN McBRIDE CHRISTOPHER E. PLATTEN KEVIN S. LANDIS ROBERT E. JESINGER, Of Counsel

2025 GATEWAY PLACE, SUITE 430 SAN JOSE, CALIFORNIA 95110

> T 408.979.2920 F 408.979.2934 www.wmprlaw.com

> > August 16, 2021

Via E-Mail Only

Cheryl Parkman, Assistant to the City Manager City of San Jose 200 E. Santa Clara Street San Jose, CA 95113

Re: IBEW, Local 332 and City of San Jose

(Negotiations of Successor MOA – Declaration of Impasse and

**Request for Fact Finding Potential Chairs)** 

## Dear Cheryl:

While IBEW Local 332 has agreed to mediation with someone appointed by the California State Mediation and Conciliation Service, the Union believes that impasse in negotiations supports a declaration to that effect and a request to PERB for the provision of a list of potential Fact Finding chairs.

This letter confirms the declaration of impasse. IBEW Local 332 will be filing with PERB a request for a list of potential Fact Finding chairs from which to select.

Please advise who from the City Attorney office will handle this matter for the City.

Local 332 wishes to process the appointment of a fact finder per the Government Code and the time period describe under Section 3505.4.

Very truly yours,

CHRISTOPHER E. PLATTEN

cc: Daniel Romero