

From: [Thomas, Paul](#)
To: [Peter Perla](#)
Subject: RE: Rochelle Park (22-CA-194401)
Date: Monday, November 25, 2019 5:00:00 PM

That's paragraph 2—postjudgment records. Paragraph 1 (below) is prejudgment records, so that the Region can do their compliance calculations.

“All payroll records, social security payment records, timecards, personnel records and reports, and all other records, including an electronic copy of such records if stored in electronic form, necessary to analyze the amount of backpay due under the terms of the judgment of the United States Court of Appeals for the Third Circuit.”

--Paul

From: Peter Perla <pperla@jplawfirm.com>
Sent: Monday, November 25, 2019 4:12 PM
To: Thomas, Paul <Paul.Thomas@nlrb.gov>
Subject: RE: Rochelle Park (22-CA-194401)

Paul

Can you check that date? I reviewed the decision you are referring to and the subpoena you served. The date reflected in your subpoena is for payroll records dating back to: October 19, 2018. Hence, those are the records we provided.

Thanks

Peter P. Perla, Jr., Esq.
JASINSKI, P.C.
Sixty Park Place, 8th Floor
Newark, New Jersey 07102
(Tel) 973-824-9700 Ext. 12
(Fax) 973-824-6061
pperla@jplawfirm.com

This e-mail may be privileged and confidential attorney-client communication and is intended only for the use of the addressee(s) named above. If you are not the intended recipient, or the employee or agent responsible for delivering this e-mail to the intended recipient, you are hereby notified that any dissemination, distribution or copying of this communication is strictly prohibited. If you have received this e-mail message in error, please delete it from your system without copying it, and immediately notify the sender by replying to this message or by telephone.

This email is not intended, nor shall it be deemed, unless otherwise expressly provided in writing, to (1) constitute or provide legal advice or counsel or create an attorney-client relationship with the firm or me, unless the recipient already has an attorney-client relationship with the firm or me; or (2) contain my electronic signature (the typewritten signature included in this e-mail is not an "electronic signature" within the meaning of Electronic Signatures in Global and National Commerce Act or any other law of similar import, including and without limitation, the Uniform Electronic Transactions Act, as the same may be enacted in any state). Statements made in this e-mail are not binding unless and until mutually satisfactory agreements memorializing the subject matter of the transmission are executed by hand and are exchanged between the parties to the agreement.

From: Thomas, Paul [<mailto:Paul.Thomas@nlrb.gov>]
Sent: Monday, November 25, 2019 3:34 PM
To: Peter Perla <pperla@jplawfirm.com>
Subject: RE: Rochelle Park (22-CA-194401)

Peter,

Thanks for reaching out. I am still waiting to hear from my people about the issue of format. I need to speak to the region—I'm not sure they will be able to work with files in PDF rather than Excel (I take it that the payroll registers are printouts of Excel spreadsheets). They *may*—I'm just not sure.

One thing I immediately note, however, is that the attached records only run back as far as 2018. My reading of the Board decision is that the backpay period begins on September 1, **2016**. See page 4 of the decision (attached above). So, I must task you with hunting down those records as well. See paragraph 1 of the subpoena. There's no immense hurry, so in light of the intervening holiday, I'll request them by December 9. If for some reason obtaining the older records is significantly more difficult than this round, let me know.

--Paul

From: Peter Perla <pperla@jplawfirm.com>
Sent: Monday, November 25, 2019 12:56 PM
To: Thomas, Paul <Paul.Thomas@nlrb.gov>
Subject: Rochelle Park (22-CA-194401)

Paul

As promised when we spoke last week, I have reviewed the information requested and attached same for your review. This should resolve everything in your application. Please do not hesitate to call me should you need to discuss this further.

Pete

Peter P. Perla, Jr., Esq.
JASINSKI, P.C.
Sixty Park Place, 8th Floor
Newark, New Jersey 07102
(Tel) 973-824-9700 Ext. 12
(Fax) 973-824-6061
pperla@jplawfirm.com

This e-mail may be privileged and confidential attorney-client communication and is intended only for the use of the addressee(s) named above. If you are not the intended recipient, or the employee or agent responsible for delivering this e-mail to the intended recipient, you are hereby notified that any dissemination, distribution or copying of this communication is strictly prohibited. If you have received this e-mail message in error, please delete it from your system without copying it, and immediately notify the sender by replying to this message or by telephone.

This email is not intended, nor shall it be deemed, unless otherwise expressly provided in writing, to (1) constitute or provide legal advice or counsel or create an attorney-client relationship with the firm or me, unless the recipient already has an attorney-client relationship with the firm or me; or (2) contain my electronic

signature (the typewritten signature included in this e-mail is not an "electronic signature" within the meaning of Electronic Signatures in Global and National Commerce Act or any other law of similar import, including and without limitation, the Uniform Electronic Transactions Act, as the same may be enacted in any state). Statements made in this e-mail are not binding unless and until mutually satisfactory agreements memorializing the subject matter of the transmission are executed by hand and are exchanged between the parties to the agreement.