

From: [Peter Perla](#)
To: [Thomas, Paul](#)
Cc: [Lerner, Helene](#)
Subject: RE: Rochelle Park (22-CA-194401) Part 3 of 3
Date: Thursday, February 20, 2020 1:58:11 PM
Attachments: [Rochelle Park Sunshine Union.pdf](#)

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From: Thomas, Paul [<mailto:Paul.Thomas@nlrb.gov>]
Sent: Thursday, February 20, 2020 11:47 AM
To: Peter Perla <pperla@jplawfirm.com>
Cc: Lerner, Helene <Helene.Lerner@nlrb.gov>
Subject: RE: Rochelle Park (22-CA-194401)

Sure thing. The employees that we've gotten address kickbacks for are:

Nestor Calbonilla
Cleveland Ellis
Luz Nunez
Yasmiley Tejada Guzman
Carmen Dyer
Antirum Dootnaughtsingh
Samuel Ukwuani
Andree Mesidor
Marie Sanon
Sylphile Emile
Maude Collins
Marie Narcisse

I got seven of these returns today, so there may still be more en route.

Thanks—Paul

From: Peter Perla <pperla@jplawfirm.com>
Sent: Thursday, February 20, 2020 11:36 AM
To: Thomas, Paul <Paul.Thomas@nlrb.gov>
Cc: Lerner, Helene <Helene.Lerner@nlrb.gov>
Subject: Re: Rochelle Park (22-CA-194401)

Paul

My apologies. [REDACTED]

[REDACTED] I believe I have the payroll records you're looking for and should be able to get them to you either today or tomorrow. In the meantime, send me the information you have that's been giving you "undeliverable messages" and I'll look into it. Hope you are well.

Pete

Sent from my iPhone

On Feb 20, 2020, at 11:19 AM, Thomas, Paul <Paul.Thomas@nlrb.gov> wrote:

Peter,

I'm following up on two matters in this case. First, I'm still looking for those pre-2018 records that we need to calculate backpay. If I don't have a date certain for production pretty soon, I'm going to have to reactivate the subpoena case.

Second, I've been getting a whole *bunch* of "return to sender" from mail sent to employee addresses. Thus, I'm requesting that the contact-info list be refreshed with new information so that we can try to find addresses and communicate with the employees who we've been unable to reach.

I'd ask that you get back to me on these matters by next **Monday, February 25**.

Thanks,

--Paul

From: Thomas, Paul
Sent: Tuesday, January 14, 2020 1:18 PM
To: Peter Perla <pperla@jplawfirm.com>

Subject: RE: Rochelle Park (22-CA-194401)

Peter,

I am unburying myself from a mountain of things that came in while I was on leave (in addition to some vexing health issues of my own), and am realizing that I never replied to this. I'm not entirely sure which deadline you're referring to—was it in the district court's order from a few months ago?

At any rate, if we can get the remaining records in by January 28 or so, that would work for me, I think. I am in internal agency bargaining for the first week of every month at this point for the foreseeable future, so I would like to get the records passed on to the Region's compliance people prior to being semi-unavailable from Feb. 3-7.

--Paul

[REDACTED]

From: Peter Perla <pperla@jplawfirm.com>

Sent: Sunday, January 5, 2020 12:25 PM

To: Thomas, Paul <Paul.Thomas@nlrb.gov>

Subject: Rochelle Park (22-CA-194401)

Importance: High

Paul

I know I still owe you some documents in the above matter. I apologize, I've been dealing with some health issues and the deadline snuck up on me. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] I'd like your consent to file an application to extend the deadline (which is on Monday) for 30 days. In the meantime, I renewed my request for the records you need to close this out. My appointment is tomorrow at 1 so the earlier you can respond back to me, the better.

Thanks

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