English Translation by Matthew J. Clutteur

A-20-440

Joint Submission Agreement Draft

Let the honorable arbitrator determine whether this case is substantively or procedurally arbitrable. If the case is not dismissed, she will determine whether the charging party's temporary layoff as an operator due to lack of work was contrary to the collective bargaining agreement and past practice and she will provide any remedy emerging from the collective bargaining agreement after considering the mitigating measures.

(handwritten signatures)

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