



**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on August 28, 2020, I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system which will send a notice of electronic filing to all counsel of record.

By: s/ Patricia J. Hill  
Attorney



of this Affidavit. The Order requires Sunbelt to “restore the bargaining unit work to the status quo that existed on August 5, 2019, including by transferring unit work back to the Franksville facility, restoring bargaining unit positions and assigning bargaining unit work to unit employees.” On August 5, 2019, the bargaining unit contained two employees, Allan Romanowski and Kyle McKellips. Sunbelt is unclear whether it is required to rehire Romanowski and McKellips specifically, and what protocol it should follow if either or both of these individuals do not wish to return to Sunbelt employment.

5. Similarly, “bargaining unit work” is undefined by the Court’s Order and there exists a dispute between Sunbelt and the Board regarding what equipment must be present at the Franksville facility to sufficiently return “bargaining unit work” as required. As of August 5, 2019, the Franksville facility had a fleet valued at approximately \$16.2 million. As of August 28, 2020, the value of the fleet at the Franksville facility was approximately \$5.6 million. After the reorganization of the Franksville facility, a portion of the equipment was reassigned to Sunbelt’s other locations across the country.

6. Some of the equipment that has been reassigned is currently on rent to Sunbelt’s customers.

7. Further, due to the impact of the COVID-19 pandemic, Sunbelt also sold some equipment that was redistributed. Sunbelt auctioned approximately 104 pieces of equipment. The total estimated replacement cost of the equipment sold is in excess of one million dollars.

8. Beyond the matter of equipment, Sunbelt is unclear as to whether the Order requires that Sunbelt hire non-bargaining unit employees in order to support and facilitate the work of Romanowski and McKellips, both of whom were employed as mechanics.

FURTHER AFFIANT SAYETH NOT.

  
\_\_\_\_\_  
Vicky Gibson

Sworn to and subscribed by for me this \_\_\_ day of August 2020 by Vicky Gibson who is [personally known to me / produced identification].

  
\_\_\_\_\_  
Notary Public

My commission expires: 8/14/22

