
MIRICK O'CONNELL

A T T O R N E Y S A T L A W

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December 29, 2020

VIA E-FILING

Paul Murphy
Acting Regional Director
National Labor Relations Board
Region One
10 Causeway Street, Suite 601
Boston, Massachusetts 02222

Re: 01-RC-270539 Milford Regional Medical Center

Dear Mr. Murphy:

Milford Regional Medical Center ("Milford Regional") is in receipt of your December 28, 2020 email requesting its Statement of Position regarding an NLRB Election. Milford Regional is in the process of gathering the requested information and will respond on or before January 6, 2021.

In the interim, however, Milford Regional respectfully requests that the hearing scheduled for 10:00 A.M. on Thursday, January 14, 2021 be rescheduled to either Friday, January 15, 2021, or Tuesday, January 19, 2021 (to the extent that a hearing is needed). As grounds for its request, I was previously scheduled (on July 1, 2020) to participate in a pre-hearing conference in another matter at the Massachusetts Department of Labor Relations on January 14, 2021 at 10:00 A.M. A copy of the Notice of Hearing previously received from the Department of Labor Relations is enclosed for reference.

Thank you for your consideration.

Very truly yours,



Nicholas Anastasopoulos

Enclosure

MIRICK, O'CONNELL, DEMALLIE & LOUGEE, LLP

WORCESTER | WESTBOROUGH | BOSTON

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Paul Murphy
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CERTIFICATE OF SERVICE

I, Nicholas Anastasopoulos, hereby certify that I have this day served a copy of this letter via e-mail on the MNA's Representatives, Alan McDonald and Kristen Barnes, McDonald, Lamond & Canzoneri, 352 Turnpike Road, Suite 210, Southborough, MA 01772.



Nicholas Anastasopoulos



THE COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF LABOR RELATIONS

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July 1, 2020

Case No.: SUP-19-7108
Charging Party: New England Police Benevolent Assoc. Inc.
Respondent: University of Massachusetts Amherst
Date Filed: 1/29/2019

NOTICE OF HEARING

Pursuant to Section 11 of M.G.L. c.150E, the Department of Labor Relations (DLR) hereby orders that a hearing and pre-hearing conference, pursuant to DLR Regulation, 456 CMR 13.03, be held on the allegations set forth in the above-referenced Complaint before the DLR on the following dates:

PRE-HEARING CONF.: THURSDAY JANUARY 14, 2021 AT 10:00 A.M. (VIA WEBEX)

HEARING: THURSDAY MARCH 4, 2021 AT 10:00 A.M. (VIA WEBEX)

Information on participating via WebEx video conference can be found on the DLR's website at <https://www.mass.gov/alerts/dlr-operations-during-coronavirus-covid-19-outbreak#1457881>

Please direct all communications regarding this matter to the DLR Hearing Officer assigned to this case:

Margaret Sullivan, Esq.
margaret.sullivan2@mass.gov
Telephone: (617)-626-7143

Parties to the proceedings have the right to appear at the hearing, to examine and cross-examine witnesses, to produce evidence and otherwise support or defend the Complaint.

The pre-hearing conference will take place via WebEx. The purpose of the pre-hearing conference is to:

- (1) Clarify and/or narrow the issues;
- (2) Determine whether the amount of anticipated testimony will necessitate scheduling multiple days of hearings;

- (3) Stipulate to facts and/or exhibits;
- (4) Dispose of any preliminary motions;
- (5) Anticipate and, if possible, resolve subpoena issues;
- (6) Facilitate the progress of the case;
- (7) Explore use of the DLR's mediation services, and
- (8) Test and ensure that all parties to the proceeding can fully participate in the videoconference.

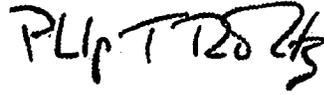
In order to facilitate the pre-hearing conference, the parties are required to file a Joint Pre-Hearing Memorandum with the hearing officer no later than **THREE DAYS PRIOR** to the pre-hearing conference. The Joint Pre-Hearing Memorandum shall include the following information:

- (1) Proposed stipulations of fact;
- (2) A list of agreed-upon joint exhibits and copies of the exhibits;
- (3) A list of prospective witnesses, including the witness' title, the specific subject matter on which the witness will testify and the expected duration of their testimony;
- (4) A list of documents each party intends to introduce at the Hearing;
- (5) A list of any subpoena issues (including who may be subpoenaed and a brief description of the documents/testimony requested);
- (6) A brief description of any pending motions;
- (7) Any other pertinent information.

The parties are responsible for cooperating fully in drafting the Joint Pre-Hearing Memorandum. The Charging Party is responsible for producing the initial draft and forwarding it to the Respondent. The Joint Pre-Hearing Memorandum must be signed by both parties or their legal representatives. If the parties are unable to file a Joint Pre-Hearing Memorandum, each party must file its own and include a reason for the failure to file jointly. Finally, the parties must efile the documents listed in the Joint Pre-hearing Memorandum along with the Memorandum.

Finally, please redact any non-essential sensitive personally identifiable information (SPII) before efilng any documents to the DLR. SPII is an individual's name in the combination with one or more of the following: dates of birth, Social Security number, driver's license number, state-issued ID card number, financial account number, or credit or debit card number. If you believe you must file documents with the DLR that contain unredacted sensitive personally identifiable information (SPII), you must prominently indicate the type of SPII contained in the document during the efilng process. The document must also be labeled as "Contains unredacted Sensitive Personally Identifiable Information."

Very truly yours,
DEPARTMENT OF LABOR RELATIONS

A handwritten signature in black ink, appearing to read "Philip T. Roberts". The signature is stylized and written in a cursive-like font.

Philip T. Roberts
Director