

**STATE OF FLORIDA
PUBLIC EMPLOYEES RELATIONS COMMISSION**

UNITED FACULTY OF FLORIDA,

Charging Party,

v.

Case No.: CA-2018-047

**FLORIDA GULF COAST UNIVERSITY
BOARD OF TRUSTEES,**

Respondent.

_____ /

**RESPONSE TO CHARGING PARTY'S FIRST
REQUEST FOR PRODUCTION TO RESPONDENT**

COMES NOW, Respondent, FLORIDA GULF COAST UNIVERSITY BOARD OF TRUSTEES, (hereinafter "Respondent"), by and through undersigned counsel, and hereby submits the following Response to Charging Party's First Request for Production of Documents:

1. Copies of all documents identified in response to UFF's First Interrogatories to FGCU.

Response: See Attachment #1.

2. Copy of the five-year strategic plan referred to in paragraph 6(13) of the Answer and Affirmative Defenses.

Response: See Attachment #2.

3. Copies of all requests from employees occupying the bargaining unit positions of Academic Advisor I, II and II to cease dues deduction of their UFF dues since January 1, 2018.

Response: See Attachment #3.

4. Copies of the job descriptions/specifications of the new Administrative and Professional positions of Academic Advisor I, II, and III, and the non-unit Administrative and Professional advisor positions existing prior to and after May 16, 2018.

Response: See Attachment #4.

5. Copies of all proposals or other documents exchanged in collective bargaining negotiations with UFF under PERC Certification 1397 regarding the language or meaning of Article 27.6(A) of all collective bargaining agreements with UFF since its certification.

Response: Respondent understands this Request as pertaining to PERC Certification 1394 rather than 1397. Respondent objects to this Request on the basis of it being overbroad and unduly burdensome. Respondent understands this Request to seek proposals that were exchanged between the Parties from 2007 to present, which represents a time period of collective bargaining negotiations spanning sixteen (16) years. Subject to and without waiving this objection and to the extent responsive documents exist, the UFF is in possession of proposals or documents previously exchanged during such negotiations.

Respectfully submitted this 13th day of February, 2019.

/s/ Michael Mattimore _____

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY, that on this 13th day of February, 2019, a true and correct copy of the foregoing was electronically mailed to Thomas W. Brooks, Esq., 131 North Gadsden Street, Tallahassee, Florida 32301 (tbrooks@meyerbookslaw.com).

/s/ Michael Mattimore
Attorney