General Drivers, Warehousemen & Helpers Local Union No. 89

3813 TAYLOR BOULEVARD • LOUISVILLE, KENTUCKY 40215-2695

PHONE (502) 368-5885
FAX (502) 366-2009
TOLL FREE (800) 782-0896

FRED ZUCKERMAN
President & Business Agent

COLVIN "JOHN" BOLTON
Secretary Treasurer

AVRAL THOMPSON
Vice-President

BEN BRAMBLE
Recording Secretary

TRUSTEES
KEN LAUERSDORF
PAUL MCINTOSH
JEFF COOPER

December 28, 2012

Via Fax: 513-731-7526 and UPS NEXT DAY DELIVERY

Erwin F. Gebhardt
Director, Labor Relations
Voith Industrial Services
9395 Kenwood Road, Suite 200
Cincinnati, OH 45242

Re: Continuing Demand for Recognition and Bargaining: Voith Industrial Services Vehicle Processing and Shipping Operations at Ford Motor Company, Louisville Assembly Plant (LAP)

Dear Mr. Gebhardt:

Teamsters Local Union No. 89 of Louisville, Kentucky, affiliated with the Teamsters National Automobile Transporters Industry Negotiating Committee ("TNATINC") and with the International Brotherhood of Teamsters ("IBT"), hereby renews its continuing demands in this matter. Teamsters Local 89 demands that Voith Industrial Services recognize and bargain with our Union in the appropriate bargaining unit of Voith Industrial Services full and part-time vehicle processing employees at the Ford Motor Company, Louisville Assembly Plant (LAP), 2000 Fern Valley Road, Louisville, Kentucky 40213-0350 working in job positions providing services related to vehicle receipt from plant, railcar load/off load, vehicle release to and receipt from haulaway carriers, vehicle inventory maintenance, railcar preparation and similar services, including employees in the job titles of driver, vehicle handler, rail loader, rail scanner and yard clerical employees, excluding guards and supervisors as defined by the Act. This demand is continuing.

The full unit description and grounds supporting this demand are detailed: (1) in the Complaint, as amended, issued by the Regional Director for Region 9 of the National Labor Relations Board in Voith Industrial Services, Inc., Case 9-CA-75496, etc.; (2) from the record of the hearing in Voith Industrial Services, Inc., Case 9-CA-75496, etc, as

described in the Counsel for the Acting General Counsel's Brief to the Administrative Law Judge filed December 7, 2012 and served upon your attorneys,: and (3) in the Decision of Administrative Law Judge in Voith Industrial Services, Inc., Case 9-CA-75496, etc, issued December 21, 2012. Teamsters Local 89 demands that Voith comply with the orders set out in the ALJ decision, including, but not limited to, prompt payment of backpay and benefits to all adversely affected workers.

Teamsters Local 89 also demands that Voith Industrial Services, on account of Voith's discriminatory unfair labor practices described in the proceedings in Case 9-CA-75496 etc., **immediately offer employment** to the named former unit employees of the predecessor as set forth in Attachment A of the ALJ Decision, and other similarly situated employees on the seniority list described in my letter of February 14, 2012 and those employees identified in the subsequent applications presented to your firm in February and March 2012, who would have been employed by Voith but for the unlawful discrimination against them. Voith's employment offer to these employees shall be to work, in their former positions or, if such positions no longer exist, in substantially equivalent positions, **without prejudice to their seniority or any other rights or privileges previously enjoyed**, discharging if necessary any full-time or temporary employees hired in their place. Teamsters Local 89 also demands that Voith rescind the contract with Aerotek to perform work which otherwise would have been performed by the former employees of Auto Handling, and offer any jobs created by this rescission, on the same basis and conditions, to the employees set forth in Attachment A or to the other similarly situated employees.

Teamsters Local Union No. 89 demands that Voith Industrial Services rescind all departures from the terms and conditions of employment under the National Master Automobile Transporters Agreement (NMATA), Central and Southern Areas Supplemental Agreement and Local Rider for the appropriate bargaining unit described herein, and retroactively restore the preexisting terms and conditions of employment under the National Master Automobile Transporters Agreement (NMATA), Central and Southern Areas Supplemental Agreement and Local Rider, including wage rates and benefit plans, immediately and during the time period Voith negotiates in good faith with our Union to a signed agreement or to good faith impasse. Teamsters Local 89 further demands that Voith make no changes to these terms and conditions without notice to and an opportunity to bargain with Teamsters Local 89. During the proceedings in Case 9-CA-75496, etc, we provided Voith representatives with the specifications of these preexisting conditions. Please contact me at the address and contact numbers listed below if there are any questions.

Under the terms of Article 5 and Article 7, Section 17 of the NMATA, Teamsters Local 89 will request the scheduling of a hearing before the National Joint Standing Seniority Committee (NJSSC) of the National Automobile Transporters Joint Arbitration Committee (NATJAC) to address the seniority application at Voith's LAP vehicle processing operations, and to assure that all bargaining unit employees are appropriately afforded their seniority rights previously enjoyed under the NMATA. We will make sure

that Voith Industrial Services receives appropriate notice from the NATJAC of the date, location and time for such hearing. Voith's regional manager Brett Griffin is familiar with this procedure, from his prior experience with a former Employer at LAP represented by Local 89.

All notices of any proposed changes to the wages, benefits and working conditions of unit employees at LAP must be in writing and served upon Teamsters Local Union No. 89, at 3813 Taylor Boulevard, Louisville, KY 40215, Phone: 502-368-5885; Fax: 502-366-2009. We are available to meet with representatives of Voith Industrial Services at that address, or at any other mutually agreeable location, to conduct collective bargaining negotiations over the terms and conditions of employment for these bargaining unit employees of Voith Industrial Services at the Ford Motor Company, Louisville Assembly Plant location. Local 89 will also serve upon Voith, within the next ten (10) days, a written request for the disclosure of information relevant and necessary to collective bargaining on behalf of the unit employees described herein.

Teamsters Local Union No. 89 will take all lawful action in support our position in this unfair labor practice dispute with Voith Industrial Services in order to vindicate the Section 7 rights of these bargaining unit employees. The lawful recognition and bargaining demands of Teamsters Local Union No. 89, on behalf of these bargaining unit employees, constitute a continuing demand through final resolution of this primary labor dispute.

Sincerely,

Fred Zuckerman

Fred Zuckerman, President
Teamsters Local Union No. 89

Copy: Stephen Richey, Esq.
Gary Marsack, Esq.

Auto Handling Corp / LAP

Yard Employees

y Roll ID#	Sen. #	Name		Seniority Date	Fringe Date	Co. Effect. Date
55	1	[redacted]	Danny	02/05/85	02/05/85	9/5/08
57	2	Bernard	Jason	03/19/87	03/19/87	9/5/08
58	3	Womack	Tyrone	03/19/87	03/19/87	9/5/08
59	4	[redacted]	William E.	11/14/89	11/14/89	9/5/08
60	5	Steinemann	Mike	05/01/90	05/01/90	9/5/08
62	6	Ruzanka	Robert	05/01/90	05/01/90	9/5/08
63	7	Murphy	Tammy	05/01/90	05/01/90	9/5/08
5	8	McGee	Vivian	05/01/90	05/01/90	9/5/08
6	9	Lehman	Frank	05/01/90	05/01/90	9/5/08
7	10	Goldsmith	Scott	08/06/90	08/06/90	9/5/08
8	11	Smith	Christopher	08/14/91	08/14/91	9/5/08
0	12	Rasool	Rasheed	08/14/91	08/14/91	9/5/08
3 - ktp	13	Goodrich	Damon	09/30/91	09/30/91	9/5/08
	14	McCray	Mike	03/24/92	03/24/92	9/5/08
	15	Ragland	Rickey	03/26/92	03/26/92	9/5/08
	16	Flanagan	James	03/30/92	03/30/92	9/5/08
- ktp	17	Wordlow	Darrick	04/02/92	04/02/92	9/5/08
	18	Kinnaird	Gary	04/07/92	04/07/92	9/5/08
	19	Kelley	Andre	05/18/92	10/24/88	9/5/08
	20	Pinkard	Cassandra	05/18/92	10/24/88	9/5/08
	21	[redacted]	Carl	05/12/93	05/12/93	9/5/08
	22	Helm	Walter	05/12/93	05/12/93	9/5/08
	23	Strong	Terri	05/12/93	05/12/93	9/5/08
disq.	24	Hawkins	Stephen	06/15/93	06/15/93	9/5/08
	25	Neel	Scott	06/15/93	06/15/93	9/5/08
	26	Laroussi	Zach	06/15/93	06/15/93	9/5/08
	27	Wallace	Cindy	06/18/93	06/18/93	9/5/08
	28	Smallwood	James	06/18/93	06/18/93	9/5/08
	29	Miller	Gayle	06/18/93	06/18/93	9/5/08
	30	Fields	Bronston	06/23/93	06/23/93	9/5/08
ktp	31	Byers	Jason	06/23/93	06/23/93	9/5/08

	32	Sullivan	Mike	08/08/94	08/08/94	9/5/08
357 - ktp	33	Norbury	Jason	08/08/94	08/08/94	9/5/08
018 - ktp	34	Blandford	Shawn	08/09/94	08/09/94	9/5/08
	35	Shaw	Mike	08/09/94	08/09/94	9/5/08
	36	Stewart	Ed	08/23/94	08/23/94	9/5/08
87	37	Gilkey	Rick	02/08/95	02/08/95	9/5/08
79	38	Byers	Tiffany	02/08/95	02/08/95	9/5/08
88	39	Grether	Wayne	02/08/95	02/08/95	9/5/08
	40	Harper	Shane	03/13/95	03/13/95	9/5/08
35 - ktp	41	Strong	Anthony	03/13/95	03/13/95	9/5/08
50 - ktp	42	Willis	Kenneth	03/14/95	03/14/95	9/5/08
1 - ktp	43	Moon	Roy	03/14/95	03/14/95	9/5/08
0 - ktp	44	Rhodes	James	03/14/95	03/14/95	9/5/08
7	45	Holland	Bill	03/21/95	03/21/95	9/5/08
7	46	Rhodes	Sandra	05/14/95	05/14/95	9/5/08
	47	Johnson	Mike	05/14/95	05/14/95	9/5/08
4	48	McCrory	Tim	05/14/95	05/14/95	9/5/08
7 - ktp	49	Bell	Stephen	09/11/95	09/11/95	9/5/08
- ktp	50	Fluhr	Russell	09/11/95	09/11/95	9/5/08
- ktp	51	Poland	Dathan	09/19/95	09/19/95	9/5/08
	52	Downs	Chris	09/22/95	09/22/95	9/5/08
cal	53	Murphy Jr.	Mike	08/23/96	08/23/96	9/5/08
	54	Kosko	Barbara	08/26/96	08/26/96	9/5/08
	55	Pate	Dorothy	08/26/96	08/26/96	9/5/08
	56	Murphy	Patti Jo	02/21/97	02/21/97	9/5/08
	57	Quinones	Arlene	10/15/98	10/15/98	9/5/08
	58	Walker	Forrest	10/15/98	10/15/98	9/5/08
	59	Parrott	E. Mitchell	10/17/98	10/17/98	9/5/08
	60	Stein	Kelly	10/19/98	10/19/98	9/5/08
	61	Fenwick	Susie	10/21/98	10/21/98	9/5/08
	62	Davis	Johnny	10/22/98	10/22/98	9/5/08
	63	Burnett	Sam	10/23/98	10/23/98	9/5/08
	64	Burton	Mark	11/16/98	11/16/98	9/5/08
	65	Johnson	Greg	11/17/98	11/17/98	9/5/08
	66	Tweedy	Bernard	11/18/98	11/18/98	9/5/08

651	67	Bell	Johnny	12/01/98	12/01/98	9/5/08
812	68	Helm	Brenda	12/07/98	12/07/98	9/5/08
v/c	69	Danks	Charlene	12/14/98	12/14/98	9/5/08
590	70	Dejean	Barbara	01/20/99	01/20/99	9/5/08
761	71	Wiesemann	Kaye	01/28/99	01/28/99	9/5/08
760	72	Murphy	R. Michael	01/28/99	01/28/99	9/5/08
759	73	Shaw	Donald	03/25/99	03/25/99	9/5/08
	74	Peters	Arthur	10/21/99	10/21/99	9/5/08
	75	Sadler	A. Faith	10/21/99	10/21/99	9/5/08
	76	Gribbins	Teresa	10/21/99	10/21/99	9/5/08
83	77	Cheatham	D. Susan	10/21/99	10/21/99	9/5/08
	78	Cress	Debra	10/21/99	10/21/99	9/5/08
13 - ktp	79	Luther	Anthony	10/21/99	10/21/99	9/5/08
	80	Lewter	Kim	10/21/99	10/21/99	9/5/08
	81	Schott	Candice	10/21/99	10/21/99	9/5/08
85	82	Devore	Brenda	10/21/99	10/21/99	9/5/08
	83	Downs	June	10/29/99	10/29/99	9/5/08
01	84	Shelburne	Angela	11/20/99	11/20/99	9/5/08
	85	Babbage	Terron	11/20/99	11/20/99	9/5/08
	86	Shafer	Reggie	11/20/99	11/20/99	9/5/08
76	87	Whitley	Kelly	06/13/03	06/13/03	9/5/08
	88	Fenwick	Travis	06/16/03	06/16/03	9/5/08
Leave	89	Thomas	Nathan	06/16/03	06/16/03	9/5/08
3 - ktp	90	Collett	Rick	06/17/03	06/17/03	9/5/08
6	91	Doss	Helen	06/28/03	06/28/03	9/5/08
8	92	Kirsch	Mike	11/13/03	11/13/03	9/5/08
9 - ktp	93	Walker	Mickey	04/28/05	04/28/05	9/5/08
3 -ktp	94	Stephenson	Alicha	04/28/05	04/28/05	9/5/08
7 - ktp	95	Swift	Brenda	04/28/05	04/28/05	9/5/08
3	96	Galloway	Edward	04/29/05	04/29/05	9/5/08
) - ktp	97	Waddle	Jamie	04/29/05	04/29/05	9/5/08
- ktp	98	Rankin	Mike	04/29/05	04/29/05	9/5/08
- ktp	99	Hoskins	Casey	04/29/05	04/29/05	9/5/08
- ktp	100	Rhodes	Hollie	04/29/05	04/29/05	9/5/08
	101	Powers	Terry	04/29/05	04/29/05	9/5/08

9523 - ktp	102	Thomas	James M.	04/29/05	04/29/05	9/5/08
9826 - ktp	103	Jones	Brad	04/29/05	04/29/05	9/5/08
1942 - ktp	104	Vines	Aaron	04/29/05	04/29/05	9/5/08
	105	Hatfield	Daniel	04/29/05	04/29/05	9/5/08
946 - ktp	106	Schofield	Kathy	07/25/05	07/25/05	9/5/08
	107	Bassett	Angela	07/25/05	07/25/05	9/5/08
926 - ktp	108	Girdley	Wayne	07/25/05	07/25/05	9/5/08
752 - ktp	109	Bridges	Paul	07/25/05	07/25/05	9/5/08
379 - ktp	110	Filburn	Adam	07/25/05	07/25/05	9/5/08
318 - ktp	111	Simpson	Brandon	07/26/05	07/26/05	9/5/08
	112	Bridges	Roy	07/29/05	07/29/05	9/5/08
	113	Ader	Steve	07/30/05	07/30/05	9/5/08
65	114	Neff	Wade	07/30/05	07/30/05	9/5/08
04	115	Truax	Sharon	07/30/05	07/30/05	9/5/08
02	116	Spencer	Judy	07/30/05	07/30/05	9/5/08
	117	Faulkner	Adam	07/30/05	07/30/05	9/5/08
50	118	Flemming	Louis	08/03/05	08/03/05	9/5/08
11	119	Burden	Michael	08/03/05	08/03/05	9/5/08
38	120	Scott	Donna	08/03/05	08/03/05	9/5/08
0 - ktp	121	Scott	Gary	08/03/05	08/03/05	9/5/08
0	122	Gaddis	Desiree	08/03/05	08/03/05	9/5/08
3	123	Proctor	John	08/03/05	08/03/05	9/5/08
	124	Miller	John	08/06/05	08/06/05	9/5/08
2	125	Clark	Jewell	08/13/05	08/13/05	9/5/08
1	126	Lowery	Jermaine	08/13/05	08/13/05	9/5/08
	127	Miller	Ralph	08/13/05	08/13/05	9/5/08
	128	Bowman/ miles	Patsey	08/13/05	08/13/05	9/5/08
	129	Durbin	Susan	08/17/05	08/17/05	9/5/08
	130	Underwood	Brenda	08/17/05	08/17/05	9/5/08
	131	Schott	Aaron	08/17/05	08/17/05	9/5/08
	132	See	Ralph	08/17/05	08/17/05	9/5/08
	133	Mitchell	Roger	08/17/05	08/17/05	9/5/08
	134	Warren	Rebecca	08/17/05	08/17/05	9/5/08
	135	George	Lisa	08/17/05	08/17/05	9/5/08
	136	Downs	Allison	08/17/05	08/17/05	9/5/08

9825	137	Rhodes	Tonya	08/17/05	08/17/05	9/5/08
9787	138	Kelley	Bronda	08/17/05	08/17/05	9/5/08
Pending	139	Burton	Richard	08/17/05	08/17/05	9/5/08
9662	140	Bowlin	Donna	08/17/05	08/17/05	9/5/08
9797	141	Cowden	John	08/17/05	08/17/05	9/5/08
9751 - ktp	142	Cox	Daniel	08/24/05	08/24/05	9/5/08
9768 - ktp	143	Hines	Micheala	08/24/05	08/24/05	9/5/08
9792	144	Dehart	Jennifer	08/24/05	08/24/05	9/5/08
9793	145	Page	Marvin	08/24/05	08/24/05	9/5/08
9524	146	Adams	Alessandra	08/24/05	08/24/05	9/5/08
	147	Helm	Marcus	08/24/05	08/24/05	9/5/08
	148	Sturgill	Brian	08/25/05	08/25/05	9/5/08
	149	Tindle	Emilean	08/25/05	08/25/05	9/5/08
9781	150	Sawyers	Eric	08/26/05	08/26/05	9/5/08
	151	Helm	Ashley	08/26/05	08/26/05	9/5/08
	152	LaFever	Christi	08/26/05	08/26/05	9/5/08
884 ktp	153	Cowen	Edward	08/27/05	08/27/05	9/5/08
	154	Churchill	Schandra	08/27/05	08/27/05	9/5/08
	155	Burkhart	Meranda	08/29/05	08/29/05	9/5/08
784	156	Dudeck Jr.	Joseph	08/29/05	08/29/05	9/5/08
	157	Danks	Charles	08/31/05	08/31/05	9/5/08
796	158	Brummett	Dennis	08/31/05	08/31/05	9/5/08
702 ktp	159	Smith	Angie	08/31/05	08/31/05	9/5/08
785	160	Lockard	Tammy	09/03/05	09/03/05	9/5/08
63	161	Pope	Marcus	09/14/05	09/14/05	9/5/08
83	162	Brooks	Lonnie	09/29/05	09/29/05	9/5/08
	163	Goldsmith	Danny	10/03/05	10/03/05	9/5/08
82	164	King	Senethia	10/03/05	10/03/05	9/5/08
15 - ktp	165	Amos	Leon	10/12/07	07/30/99	9/5/08
95 - clerk		**Morris**	Tanitra	***03/31/01***	***03/31/01***	9/5/08