



Legal Department

Mail Code L585
3181 SW Sam Jackson Park Rd.
Portland, OR 97239

tel 503-494-5222
fax 503-494-0917

September 13, 2018

Sarah Hackett
Employment Relations Board Mediation and Elections Coordinator
Old Garfield School Building
Sarah.Hackett@oregon.gov
528 Cottage Street, NE, Suite 400
Salem, OR 97301-3807

Re: Oregon AFSCME Council 75 v. Oregon Health & Science University; Case No. RC-012-18

Dear Ms. Hackett:

OHSU objects to the petition filed in Case No. RC-012-18. On August 29, 2018, Petitioner filed a Petition for Representation without Election seeking to form a new bargaining unit and designate AFSCME Council 75 as the representative of: "All OHSU graduate students seeking PhD degrees who receive stipends, excluding supervisors, confidential employees, and managerial employees."

OHSU objects to the Petition because the proposed unit of graduate students seeking PhD degrees who receive stipends are not "public employees" as defined by ORS 243.650(19) and ERB precedent. *See, Coalition of Graduate Employees, Local 6069 v. Oregon University System, Oregon State University, Case No. UC-04-12, 25 PECBR 356 (2013).*

For all of the above stated reasons, OHSU respectfully request that the petition filed in this case be dismissed.

Best regards,

A handwritten signature in black ink that reads "D. Walker" followed by a horizontal line.

Darryl Walker
OHSU Legal Counsel

CERTIFICATE OF SERVICE

I hereby certify that on the 13th day of September, 2018, I served the foregoing **OBJECTION TO PETITION** on the following:

Jennifer Chapman
Oregon AFSCME
1400 Tandem Ave. NE
Salem, OR 97301
jchapman@oregonafscme.com

by emailing and mailing a true and correct copy of thereof, certified by me as such, place in a sealed envelope addressed to the addresses set forth above, and deposited in the U.S. Post Office at Portland, Oregon on said day with postage prepaid.



Darryl Walker, OSB No. 931747
3181 SW Sam Jackson Park Road, L585
Portland, Oregon 97239