

Issue: Consecutive Days Off

Article 8.2

Documentation

Explanation

All grievance paperwork	All paperwork developed and utilized in grievance procedure
Copy of duty assignment(s) posting	This would show the triggering event of management posting or reposting a job with split days off
If reposting, copy of original duty assignment posting	Shows history of job. Also shows job had consecutive days off for a period of time
Dictionary definition of the words practical and practicable	CBA requires "practicable" - capable of being done. Strong requirement when argued properly. Major difference between words "practical" and "practicable"
Interview notes which tell us deciding official's specific reason for splitting off-days	Critical to tie down specific reasons as soon as possible. Also request management's supporting documentation. What changed operationally?
Documentation from management which allegedly justifies action	Management proofs. Allows you to check out and determine validity
Paperwork from Union which shows consecutive days off practicable for job(s) in dispute	Our burden to carry. Available work hours by day, current and past crew sheets (work schedules) for concerned area, and if necessary a favorable hypothetical work schedule which shows consecutive days off
Applicable case law. Remember difference between precedent and persuasive value	All paperwork developed and utilized in grievance procedure. Strengthens case through Step 4s, national arbitrations or pre-arbs, regional arbitrations or pre-arbs. Cites must be on point