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November 29, 2010

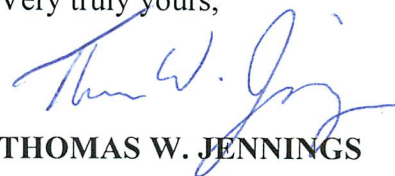
Elaine McLaughlin
American Arbitration Association
230 South Broad Street, 12th Floor
Philadelphia, PA 19102-4199

**RE: Fraternal Order of Police Lodge No. 5 – and – City of Philadelphia
Shift Schedule**

Dear Ms. McLaughlin:

Enclosed please find a Demand for Arbitration filed this date with the American Arbitration Association in the above-captioned matter. The original has been forwarded to the Respondent.

Very truly yours,



THOMAS W. JENNINGS

TWJ/plo
Enclosure
cc: John McGrody



LABOR ARBITRATION RULES
Demand for Arbitration

MEDIATION: Please consult the AAA regarding mediation procedures. If you would like the AAA to contact the other parties and attempt to arrange a mediation, please check this box <input type="checkbox"/>					
Name of Respondent <input checked="" type="checkbox"/> Employer or <input type="checkbox"/> Union			Name of Representative (if known)		
Contact Person Police Commissioner Charles Ramsey			Name of Firm (if applicable)		
Address: Police Administration Building, Franklin Sq., Room 314 Race Street			Representative's Address:		
City Philadelphia	State PA	Zip Code 19106	City	State	Zip Code
Phone No. 215-686-8000		Fax No.	Phone No.		Fax No.
Email Address:			Email Address:		
The named claimant, a party to an arbitration agreement dated _____, which provides for arbitration under the Labor Arbitration Rules of the American Arbitration Association, hereby demands arbitration.					
Nature of Grievance: See Attached					
Name of Grievant(s) (if applicable): See Attached					
Claim or Relief Sought: See Attached					
REMINDER: You can file your case online by visiting the AAA's website at www.adr.org . Please select "AAA Webfile" from the list of side menu options. You may also wish to visit the "Labor" "Focus Area" for a complete list of our administrative services and procedures, including our Expedited Procedures.					
AMOUNT OF FILING FEE ENCLOSED WITH THIS DEMAND (please refer to the rules for the appropriate fee) \$					
THE FILING PARTY REQUESTS THAT HEARINGS BE HELD AT THE FOLLOWING LOCALE: _____					
You are hereby notified that copies of our arbitration agreement and this demand are being filed with the American Arbitration Association office located in Philadelphia, PA _____, with a request that it commence administration of the arbitration. Under the rules, you may file an answering statement within ten days after notice from the AAA.					
Signature (may be signed by a representative)		Date:	Name of Representative		
			Thomas W. Jennings, Esquire		
Name of the Claiming <input checked="" type="checkbox"/> Union or <input type="checkbox"/> Employer Fraternal Order of Police Lodge No. 5			Name of Firm (if applicable) Jennings Sigmond, P.C.		
Address (to be used in connection with this case): Penn Mutual Towers 16th Floor, 510 Walnut Street			Representative's Address: Penn Mutual Towers 16th Floor, 510 Walnut Street		
City Philadelphia	State PA	Zip Code 19106-3683	City Philadelphia	State PA	Zip Code 19106-3683
Phone No. (215) 351-0612		Fax No. (215) 922-3524	Phone No. (215) 351-0612		Fax No. (215) 922-3524
Email Address: pogden@jslex.com			Email Address: pogden@jslex.com		
To begin proceedings, please send two copies of this Demand and the Arbitration Agreement or relevant contract language, along with the filing fee as provided for in the Rules, to the AAA. Send the original Demand to the Respondent.					
AAA Customer Service can be reached at 800-778-7879					

Issue:

The collective bargaining agreement between the parties provides as follows:

- Except as provided below, any proposal by the City to modify work schedules shall be submitted for discussion to a joint committee with an equal number of representatives of the FOP and the City. If no agreement is reached regarding the City's proposal, the disagreement shall be submitted to a mutually agreed upon neutral who shall be required to fully resolve the issues in dispute within ten (10) days of the date of the submission. The City may not implement any terms of its proposal until issuance of the neutral's decision. Any proposal by the FOP to modify work schedules also shall be submitted to the committee; however, no such proposal will be submitted to the neutral and will not be implemented unless the parties reach agreement.

The Department has announced its intention to modify the work schedules of at least patrol officers and no agreement has been reached regarding that proposal.

The FOP hereby requests arbitration of this proposal.

Remedy:

1. Cease implementation of proposal until arbitration is completed.
2. Void proposal after arbitration.