

SILVER GOLUB & TEITELL LLP

SEBAC, et al v. ROWLAND, et al
No. 3:03 cv 0221 (AVC) (D. Conn.)

Attorney-Client Information - privileged

In order to implement the settlement of this lawsuit, we need information from all union members who were affected by the layoffs orders. Affected employees fall into one of the following classifications:

1. Employees who received a layoff notice in 2002 or 2003 and were laid off and never returned to state employment;
2. Employees who received a layoff notice in 2002 or 2003 and were laid off and subsequently returned to state employment;
3. Employees who received a layoff notice and elected to take early retirement;
4. Employees who received a layoff notice but were able to bump a less senior employee and obtain a lesser paying position (or position at the same grade that required travel or other additional expenses);
5. Employees who were bumped out of their positions by more senior employees who received layoff notices and who then fall into one of the four categories listed above.

If you fall into one of the above categories, please fill out the attached form and email or fax the form back to us as soon as possible. If you have questions about the form or the information we are seeking, please contact us - preferably by email to mjackson@sgtlaw.com; by fax to 203-325-3769; or by regular mail to Silver Golub & Teitell LLP, Attn: Martha Jackson, 184 Atlantic Street, Stamford, CT 06901; or by telephone to Martha Jackson at 877 731-9050.

Thanks.

DAVID S. GOLUB
JONATHAN M. LEVINE
SILVER GOLUB & TEITELL LLP

Name: _____

State Employee ID #: _____

Union: _____

Address: _____

Personal Email: _____

Home or cell telephone: _____

I. IF YOU WERE LAID OFF IN 2003:

1. If you were laid off in 2003, please tell us:

a. the date you were laid off: _____

b. your position at the time you were laid off (including whatever information you know concerning your job class, pay grade and salary step): _____

c. your annual compensation at the time you were laid off (including if you know, your total annual compensation, base salary and longevity): _____

d. whether in the six months before you were laid off, you received additional pay as a result of overtime, a shift differential or a weekend differential: _____

2. If you were laid off in 2003 and subsequently rehired by the State, please tell us:

a. the date you were rehired: _____

b. the position to which you were rehired (including whatever information you know concerning your job class, pay grade and salary step): _____

c. your annual compensation at the time you were rehired (including if you know, your total annual compensation, base salary and longevity): _____

3. If you were laid off in 2003 – either permanently or temporarily – and obtained other work during the period you were laid off, please tell us:

a. each place you worked and the dates you worked there: _____

b. your actual earnings in any other employment: _____

c. do you have tax returns or other documentation showing any other employment compensation you received: _____

[PLEASE ATTACH ANY SUCH DOCUMENTATION TO THIS QUESTIONNAIRE WHEN YOU RETURN IT TO US].

II. IF YOU WERE BUMPED OR TRANSFERRED TO A NEW POSITION IN 2003. EITHER BECAUSE YOU EXERCISED BUMPING RIGHTS OR BECAUSE ANOTHER EMPLOYEE BUMPED YOU: _____

4. If you were bumped or transferred to a new position in 2003, please tell us:

a. the date you changed your position: _____

b. the position from which you were bumped or transferred (including whatever information you know concerning your job class, pay grade and salary step): _____

c. whether in the six months before you were laid off, you received additional pay as a result of overtime, a shift differential or a weekend differential: _____

d. the new position you were bumped or transferred to (including whatever information you know concerning your job class, pay grade and salary step): _____

e. your annual compensation before you changed position (including if you know, your total annual compensation, base salary and longevity): _____

f. your annual compensation in 2003 upon your change in position (including if you know, your total annual compensation, base salary and longevity): _____

g. whether, as a result of your transfer, you believe your commute increased by more than 25 miles one way: _____

h. if the answer to question g. was yes, please tell us:

1. your home address at the time of the transfer:

2. your work address before the transfer:

3. your work address after the transfer

4. the dates that you had to drive the added commute.

i. any other damages or loss you sustained as a result of being bumped or transferred: _____

III. IF YOU TOOK EARLY RETIREMENT BECAUSE OF A LAYOFF NOTICE DIRECTED TO YOU OR SOMEONE IN YOUR WORK AREA

5. If you took early retirement in 2003 because of a layoff notice directed to you or someone in your work area or that you knew, please tell us:

a. whether the notice was directed to you or someone in your work area: _____

b. the date you retired: _____

c. whether you had particular concerns that caused you to retire (i.e., concern about maintaining health insurance, concern that you were unlikely to be rehired off the SEBAC list): _____

d. when (at what age) you planned to retire from State employment if you had not been laid off: _____

e. your position at the time you retired (including whatever information you know concerning your job class, pay grade and salary step): _____

f. your annual compensation at the time you retired (including if you know, your total annual compensation, base salary and longevity): _____

g. whether you benefitted from any special retirement incentive program and, if so, which one: _____

h. the annual retirement payments you receive: _____

[PLEASE ATTACH ANY DOCUMENTATION OF THE PENSION CALCULATION YOU RECEIVED WHEN YOU RETIRED TO THIS QUESTIONNAIRE WHEN YOU RETURN IT TO US.]

i. if you worked anywhere else after taking retirement, each place you worked and the dates you worked there: _____

j. your actual earnings in any other employment: _____

k. do you have tax returns or other documentation showing any other employment compensation you received: _____

[PLEASE ATTACH ANY SUCH DOCUMENTATION TO THIS QUESTIONNAIRE WHEN YOU RETURN IT TO US]

PLEASE RETURN THIS FORM AND ANY ATTACHED DOCUMENTATION TO
MARTHA JACKSON:

BY EMAIL – MJACKSON@SGTLAW.COM

BY FAX – 203 325-3769

OR BY REGULAR MAIL TO:

SILVER GOLUB & TEITELL LLP.

ATTN: MARTHA JACKSON,

184 ATLANTIC STREET,

STAMFORD, CT 06901.

IF YOU HAVE ANY QUESTIONS, PLEASE FEEL FREE TO EMAIL OR TELEPHONE (877
731-9050) MS. JACKSON.