BLACK GROPPER
LABOUR & EMPLOYMENT LAWYERS

1640 - 401 West Georgia Street
Vancouver, BC V6B 5A1

Allan E. Black, Q.C.* S. Michelle Blendell Jessica L. Burke**
Carolyn M. Janusz Stephanie T. Mayor

Our Ref.: 6102-31
Allan E. Black, Q.C.
Direct Line: (604) 632-3380
Email: ablack@blackgropper.com

January 25, 2016

VIA EMAIL

Stan Lanyon, Q.C.
217 – 713 Columbia Street
New Westminster, BC V3M 1B2

Dear Mr. Lanyon:

Re: University of Northern British Columbia ("UNBC" or the "University")
-and- University of Northern British Columbia Faculty Association
(the "Faculty Association")
(Interest Arbitration 2015)

We have now received and considered Mr. Gilligan-Hackett's response to our letter of January 12, 2016 in respect of the above matter.

With all due respect, the University seeks to mischaracterize and misstate the intention of our letter of January 12, 2016. This is not an application to introduce new evidence which could have been introduced at the time the case was heard or new argument that could have been made at the time the case was heard. Rather, because of the confusion and concern identified by members of the bargaining unit, we have asked you to clarify the comments made in your Award and specifically, those at paragraphs [103] and [104].

The information appended to our letter of January 12, 2016, addresses the concern that has arisen and supports our submission that your Award will not result in a reduction in the difference between actual UNBC faculty salaries and those at UVic for faculty. It was not our intention to introduce any further evidence in respect of the clarification that we sought.

Conversely, the University seeks to introduce provisions of the Collective Agreement between the University of Victoria and the University of Victoria Faculty Association that were not before you either in evidence or argument. Neither party referred to or relied on those provisions in advancing their respective positions.

We have nothing further to say as we believe that the information contained in our January 12, 2016 submission is sufficient to obtain the clarification which we seek in respect of paragraphs [103] and [104].

ALL OF WHICH IS RESPECTFULLY SUBMITTED.

Yours truly,

BLACK GROPPER
Per:

Allan E. Black, Q.C.

AEB/tk

cc: Gilligan-Hackett & Company *(via email)*
Attention: Patrick Gilligan-Hackett

UNBC Faculty Association *(via email)*
Attention: Ted Binnema, Jacqueline Holler, Donna Plourde