

From: Sean Donahue <seandonahue630@gmail.com>

Sent: Monday, May 22, 2017 4:44 PM

To: Pedri, David; Carroll, Jackie

Cc: Dobash, Kathy; Luzerne County Council Members

Subject: Request for Discovery, Administrative Matters and Good Faith Effort in PA State Civil Service Commission Case Docket No:29615 Recent Hiring of Income Maintenance Caseworkers

Dear Mr. Pedri and Ms. Carroll,

Please provide me with a copy of all civil service "list of eligibles" that were used in the recent hiring of individuals to fill the vacant Income Maintenance Caseworker positions.

Please provide me a list of names of all those who were hired.

Please provide me a list of still open positions.

Please provide me a list of all filled positions and the dated upon which they were filled.

Please identify which hired individuals are honorably discharged veterans who were entitled to veterans preference for the position and which applicants were not entitled to veterans preference for hiring into the position.

Please identify which individuals were hired into the position as a promotion.

Settlement Offer: I am willing to accept hiring into any still open Income Maintenance Caseworker Position or another professional civil service position.

Please let me know if you do not intend to provide the requested discovery.

Please let me know who will be representing the County if not Ms.Carroll.

If the county does not intend to provide the requested discovery then I think we should request a pre-hearing phone conference with the State Civil Service Commission on that point. I would also like to request that the Civil Service Commission hold the hearing in the Luzerne County Courthouse, the Annex or another location. Do you object to such a request.

Respectfully,
Sean M. Donahue