

RIETH-RILEY CONSTRUCTION Co., Inc.

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September 4, 2018

Livingston County Road Commission
3535 Grand Oaks Drive
Howell, MI 48843

RE: Request to Suspend Work and Notice of Intent to File Claim Pavement Preservation Program 2018

Dear Ms. Tedesco,

At 12:00 AM on June 1, 2018, the collective bargaining agreement between the International Union of Operating Engineers (OE) and the Michigan Infrastructure and Transportation Association (MITA), commonly referred to within the industry as the OE Road Agreement, expired.

Although the industry (MITA) has made several attempts to initiate negotiations with the OE, the union has refused to meet and has since initiated a strike against a MITA member contractor. Therefore, a lockout of all OE 324 members was initiated on Tuesday, September 4, 2018, at 7:00 AM.

As a result of this ongoing labor dispute, we are unable to make constructive progress on this project, and we must shut it down. In accordance with subsection 104.07 of the MDOT 2012 Standard Specifications for Construction, we are requesting your approval to suspend the work on this project due to this ongoing labor dispute.

Due to the possibility that this labor dispute may extend for an unknown length of time, we are also formally submitting this Notice of Intent to File Claim for an extension of time and additional compensation that are the result of this labor dispute shutdown (i.e. suspension of work).

All claims for additional time and/or compensation resulting from this shutdown will be filed in accordance with the MDOT 2012 Standard Specifications for Construction, as well as any applicable Supplemental Specifications or Special Provisions, once the full impacts of the shutdown have been realized and quantified.

This notice of intent is being submitted in accordance with subsection 104.10 of the MDOT 2012 Standard Specifications for Construction.

Respectfully,

RIETH-RILEY CONSTRUCTION CO., INC.



Shaundel Elowski
Engineer/Estimator

