

## Schedule A

The Applicant requests that the Board order the following relief:

1. An Order setting set aside the Memorandum of Agreement between Pacific Western Transit (PWT), Durham Region Transit (DRT), and Unifor Local 222 regarding the rights of PWT employees to be employed by DRT upon the expiration of PWT's service contract on December 31, 2023.
2. An Order directing the parties to negotiate a new agreement.
3. An Order that the Chairperson and Bargaining Committee of the PWT unit, the Unifor National Representative for the PWT Units, and representatives of the DRT Unit be invited to participate fully in negotiating the new agreement.
4. An Order directing Unifor to file an application with the Ontario Labour Relations Board or as otherwise may be directed seeking relief under the *Labour Relations Act, 1995* and/or the *Employment Standards Act, 2000* arguing that the PWT and DRT are related employers and/or that there has been a sale of a business to DRT and that DRT is a successor employer to PWT.
5. An order directing that the employees of PWTransit be compensated and made whole for any losses in wages and benefits incurred as a result of the Union's failure to represent them fairly.
6. Such further and other relief as may be advised and such further and other relief as may be required to ensure that the PWT employees receive equity and fair representation, and that they do not have their employment security or existing rights based on service and seniority reduced or eliminated.