

RETURN DATE: AUGUST 3, 2021

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State Employees Bargaining Agent	:	SUPERIOR COURT
Coalition (SEBAC),	:	
Plaintiff	:	J.D. OF HARTFORD
	:	
v.	:	
State of Connecticut,	:	
Defendant	:	

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JULY 6, 2021

**MOTION FOR TEMPORARY INJUNCTION**  
**AND EMERGENCY ORDER TO SHOW CAUSE**

To prevent irreparable harm from occurring to the Plaintiff and its members, the Plaintiff State Employees Bargaining Agent Coalition (“SEBAC” or “the Plaintiff”) hereby makes this emergency motion for an order to show cause and temporary injunction in accordance with the prayer for relief contained in the attached Verified Complaint, which allegations are incorporated herein by reference. As set forth in that complaint, the Defendant on or about June 16, 2021, entered into an agreement, the “Transition Telework Agreement” with the Plaintiff concerning the teleworking opportunities of as many as 10,000 state employees. By June 30<sup>th</sup>, and continuing, the Defendant has intentionally and unlawfully acted to abrogate that agreement. The Defendant’s intentional abrogation of a collective bargaining agreement is the subject of a grievance proceeding and a State Board of Labor Relations Complaint, but neither of

such venues is capable of acting with the speed necessary to prevent irreparable harm to the Plaintiff and its members. Absent immediate action by this Court:

(a) Union members will be denied the telework opportunities provided by the transition agreement and while the State Board of Labor Relations or an arbitrator may correct that denial going forward, no order can retroactively provide those opportunities for the time between July 1st and final order of the arbitrator or State Board.

(b) SEBAC and its constituent unions will be harmed in that the Defendant's blatant, intentional abrogation of an agreement and total disregard for its legal duty to bargain with the union and to honor those bargains without an effective legal remedy will lessen employee faith in the effectiveness of collective bargaining and self-organization and in the organizations they have chosen.

SEBAC respectfully requests that a temporary restraining order be issued. Absent such relief, substantial and irreparable injury to SEBAC and its members will be unavoidable.

WHEREFORE, the Plaintiff requests that the foregoing Motion be granted and that an Order to Show Cause be issued directing the Defendant to show cause why such injunction should not be granted. The plaintiff certifies that a copy of all the pleadings and moving papers herein has been provided to counsel for the defendant, S. Fae Brown-Brewton, Undersecretary for Labor Relations, by electronic service on this date.

THE PLAINTIFF

A handwritten signature in black ink, appearing to read "Dan E. Livingston", written over a horizontal line.

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& Kelly, PC  
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