



*(l-r) Former Local 304 President James Bell and General Counsel Bruce R. Lerner*



*Local 305 Shop Steward Lamar Grigsby*



*Local 313 President Julio Figueroa addressing the trainers*



*National President John Hegarty makes a point during the training.*



*Eastern Region Vice President and National Trainer Sam D'Ambrosio*



*Northeastern Vice President and Local 300 President Paul Hogrogian*



*Local 298 Shop Steward Jeff Easedale*



*Local 334 Treasurer Kent Holliday*

closing statements; how to prepare and conduct direct and cross-examination; how to properly introduce exhibits and other evidence; the use of objections to contest management evidence; the presentation of rebuttal evidence; and the submission of post-hearing briefs.

The training was geared to advocates at every level of arbitration experience, and rather than simply state rules or principles, it provided very specific "how-tos" in each area. For example, on the topic of direct examination, participants were told what kinds of questions to prepare; how to structure the direct exami-

nation so that the arbitrator will clearly understand the testimony; the importance of having the witness describe the facts in his or her own words (not sounding scripted); examples of questions used in starting the direct examination to put the witness at ease; the kinds of questions that are permissible and those that are not, with examples of each; how (and how not) to phrase questions; and whether to address weaknesses with the witness during direct testimony if you anticipate the Postal Service advocate will raise those weaknesses on cross-examination. This same, very

practical, step-by-step approach was followed in all of the presentations. Participants were able to come away with a real-life understanding of how to arbitrate a case.

To further assist Union advocates, and as part of the Arbitration Advocacy Reference Manual that was distributed to participants at the training session, the trainers provided samples, from actual cases presented by NMPHU advocates, of various aspects of arbitration. These included sample statements of the issue; sample stipulations; sample opening statements; sample direct examinations; sample cross-exami-

nations; sample closing statements; and sample post-hearing briefs. These materials reinforced the information provided in the verbal and written presentations.

For probably the first time in arbitration training, a full presentation was devoted to issues of "remedy." This was important because the Postal Service increasingly is instructing its advocates to devote a substantial amount of time – at the hearing and in post-hearing briefs – to trying to limit or eliminate any potential remedy that would cost the Postal Service money. Especially in high-liability

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*Central Region Vice President and Local 306 President Jefferson C. Peppers III*



*Local 306 Branch President Bill Rodriguez*



*National CAD Manager Bill Flynn interacting with NPMHU local leaders during the training*



*Arbitrator Larry Holden was a special guest presenter at the training.*



*Local 321 President Michael Hora*