

UNITED STATES DISTRICT COURT
DISTRICT OF CONNECTICUT

FILED

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U.S. DISTRICT COURT
BRIDGEPORT, CONN

RAYMOND P. BALDYGA, JR.,	:	
	:	
Plaintiff,	:	Civil Action No.
	:	3:02 CV 1141 (JCH)
v.	:	
	:	January 20, 2005
SIKORSKY AIRCRAFT	:	
CORPORATION,	:	
	:	
Defendant.	:	

**DECLARATION OF ANESSA ABRAMS, ESQUIRE IN SUPPORT OF DEFENDANT'S
MOTION FOR SUMMARY JUDGMENT**

I, Anessa Abrams, hereby declare as follows:

1. I am an attorney of record for defendant Sikorsky Aircraft Corporation ("Sikorsky Aircraft" or "the Company") in the above-captioned action. I am making this declaration based on personal knowledge.

2. Attached hereto as Exhibit A is a true and correct copy of the relevant pages of the first day of testimony in *In the Matter of the Arbitration between Teamsters Local 1150 and Sikorsky Aircraft Corporation (Grievant: Ray Baldyga)*, conducted on May 10, 2002.

3. Attached hereto as Exhibit B is a true and correct copy of the relevant pages of the second day of testimony in *In the Matter of the Arbitration between Teamsters Local 1150 and Sikorsky Aircraft Corporation (Grievant: Ray Baldyga)*, conducted on October 3, 2002.

4. Attached hereto as Exhibit C is a true and correct copy of the relevant pages of the deposition testimony of Raymond P. Baldyga, Jr., conducted on February 6, 2003.

5. Attached hereto as Exhibit D is a true and correct copy of the relevant pages of the deposition testimony of William Lucas, Jr., conducted on February 13, 2003.


6. Attached hereto as Exhibit E is a true and correct copy of the Equal Employment Opportunity Commission's Dismissal and Notice of Rights addressed to Mr. Baldyga, dated April 24, 2002.

7. Attached hereto as Exhibit F is a true and correct copy of the Sikorsky Aircraft Hourly Job Description for the position of Working Leader – Receiving and Layout Inspection, job code 5420, labor grade 2. This document was part of Company Exhibit 2(a) in *In the Matter of the Arbitration between Teamsters Local 1150 and Sikorsky Aircraft Corporation (Grievant: Ray Baldyga)*.

8. Attached hereto as Exhibit G is a true and correct copy of the first page of the Sikorsky Aircraft Hourly Job Description for the position of Working Leader – Machine Shop Floor Inspection, job code 5019, labor grade 2. This document was part of Company Exhibit 2(b) in *In the Matter of the Arbitration between Teamsters Local 1150 and Sikorsky Aircraft Corporation (Grievant: Ray Baldyga)*.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 19th day of January, 2005, in Washington, D.C.


Anessa Abrams