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April 20, 2018

Via Fax: 780-422-0970
(Original to follow in mail)

Alberta Labour Relations Board
 501, 10808 – 99 Avenue
 Edmonton, AB T5K 0G5

Attention: Tannis Brown, Director of Settlement

RE: An Application for Intervener Status brought by the Alberta Union of Provincial Employees pursuant to ss. 12 and 16 of the Code and s. 27 of the Rules of Procedure respecting an application for determination brought by the United Nurses of Alberta affecting Alberta Health Services- Board File No.

1. The Applicant:

Alberta Union of Provincial Employees ("AUPE")
 10451 – 170 Street
 Edmonton, AB T5P 4S7
 Phone: (780) 930-5214, Fax: (780) 930-3392
 Contact Person: Larry Dawson, Union Representative (counsel)

2. The Respondents:

- I. United Nurses of Alberta ("UNA")
 700, 11150 Jasper Ave
 Edmonton, AB T5K 0C7
 Fax: 780-426-2093
 Attn: David Harrigan; Lee Coughlan



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II. Alberta Health Services ("AHS")
900, 9925-109 Street NW
Edmonton, AB T5K 2J8
Attn: Mr. Mark Kent
Ph. 780-426-8542 Fax: 780-424-4309

3. Sections of the "Code" relied upon for this Application:

In support of this application AUPE relies upon sections 12 and 16 of the Code and on s. 27(d) of the Rules of Procedure.

4. Particulars of the Application:

1. AUPE is the certified bargaining agent for a unit of employees of Alberta Health Services described as *All employees when employed in auxiliary nursing care*. Issued 09/19/217; File No. BR-17826. Certificate No. 98-2017.
2. A collective agreement has been in place between the parties with effective dates of July 1, 2014 to March 31st, 2017.
3. AUPE's above described bargaining experience is substantially similar to that described by UNA in its Application. Because of this and because such experience is in relation to the same parties complained about by UNA, AUPE will be in a position to assist the Board in evaluating such parties' conduct in bargaining as well as whether there exists a valid labour relations purpose for granting the declaration sought by UNA.
4. The Board's decision on UNA's application, whether positive or negative, will have a direct impact and effect on the manner in which bargaining proceeds between AUPE and Alberta Health Services, as well, potentially, in other Health Care Institutions that AUPE represents that may have Nurse Practitioners employed. Should UNA's application be accepted it is obvious that the same labour relations purpose would apply to AUPE's bargaining relationship with Alberta Health Services as well as with other Health Care Institutions. *A contrario* should the application be rejected, either way, there would then be no need to re-litigate these specific issues if the present application for intervener status is accepted.

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5. Remedies Sought:

1. Grant the present application for intervener status.
2. Grant to AUPE full status as a party in Board File- No. GE-07033 entitled to call evidence and provide oral or written representations on all of the issues before the Board.

A copy of this application has been forwarded to all parties involved as set out in the contact information below.

Please address all responses to Larry Dawson, Union Representative (Counsel)
(780-691-7670) or at l.dawson@aupe.org.

Sincerely,



L.T. (Larry) Dawson
Union Representative (counsel)
Disputes and Arbitrations
AUPE

LD/rg/AULReP

c.c. Jim Petrie, Director of Labour Relations, AUPE
Mac McNaughton, Union Representative (Negotiations), AUPE
Kristan McLeod, Counsel, Chivers Carpenter Lawyers (via fax: 780-439-8543)
David Harrigan; Lee Coughlan, United Nurses of Alberta (via fax: 780-426-2093)
Jackie Laviolette, Associate General Counsel, AHS, (via fax: (403-943-0972)
Monica Bokenfohr; Dennis Holliday, AHS (via fax: 780-424-4309)
Laura Hureau, Health Sciences Association of Alberta (via fax: 780-488-0534)
Chris Lane, Legal Counsel, Covenant Health (via fax: 780-733-9726)