AFFIDAVIT OF MICHAEL MANSKER

STATE OF IOWA)
) **SS**
COUNTY OF Scott)

I, Michael Mansker, being first duly sworn upon my oath, hereby state as follows:

1. My name is Michael Mansker and I am Chair of UAW Local 281.

2. The union has taken careful steps to ensure orderly pickets including posting rules about picketing and reviewing rules with members before they begin their picket duty.

3. Law enforcement has not arrested or cited anyone and actually has complimented gate captains about the orderly nature of the pickets and conduct of members.

4. I not aware of any issues with burn barrels presenting any form of safety hazard.

5. I am not aware of any issues with chairs in any way being a hazard at picketing areas.

6. Members carry and waive signs on picket duty. I am not aware of issues with signs being used any specific way in which a sign has been used to threaten any person.

7. I have received no notice of any vehicle actually being blocked and prevented from entry or exit of any part of the facility.

8. The local union has reason to believe, based on the observations by members on picket duty, that vehicles entering and exiting the purported contractor gate are doing regular work associated with ongoing business activities that would normally be performed by members of the bargaining unit on strike.

9. No one has presented the local union with any information about any specific incident of verbal harassment or threats including vulgarities.

10. No one has reported to the local union any near misses with vehicles coming close to actually striking picketers at any picket location.

11. The local union is committed to responding to complaints about alleged misconduct by picketers with direct, verbal interactions and removing from picket duty anyone who is involved with misconduct on the picket line.

12. Representatives of the local union and international union have been and continue to be in regular communication, including in bargaining sessions regarding this ongoing labor dispute, with representatives of Deere & Company.