



October 16, 2024

Custodian of Records
c/o Sydney Savion
Vice Chancellor for People, Culture and Belonging
Vanderbilt University
Baker Building
110 21st Avenue South, 10th Floor
Nashville, TN 37203

UPS Overnight

DEBORAH GODWIN
SAMUEL MORRIS*
EUGENE LAURENZI † **
LEE J. BLOOMFIELD ***
BARCLAY M. ROBERTS
TIMOTHY TAYLOR
BETSY B. MCKINNEY
TESS SHELTON

RE: Vanderbilt University and UAW
NLRB #10-RC-351808

* ALSO LICENSED IN INDIANA
** ALSO LICENSED IN MISSISSIPPI
*** ALSO LICENSED IN KENTUCKY

Dear Ms. Savion:

† CERTIFIED CIVIL TRIAL
SPECIALIST BY
TENNESSEE COMMISSION
ON CONTINUING LEGAL
EDUCATION AND
SPECIALIZATION AND
NATIONAL BOARD OF
TRIAL ADVOCACY

I am enclosing a subpoena duces tecum along with a check in the amount of \$55.00 in regard to the above referenced matter, requiring your production of documents and your attendance at a hearing at the Hearing Room of the National Labor Relations Board Region 10 located at 810 Broadway, Suite 302, Nashville, TN on October 21, 2024 at 10:00 AM.

If you have any questions, please contact me or your attorney.

Sincerely,

GODWIN, MORRIS,
LAURENZI & BLOOMFIELD, P.C.



SAMUEL MORRIS
Attorney at Law

SM/eb
Enclosures

SUBPOENA DUCES TECUM

**UNITED STATES OF AMERICA
NATIONAL LABOR RELATIONS BOARD**

To Vanderbilt University, Custodian of Records

As requested by Samuel Morris, Counsel for Petitioner

whose address is 50 N. Front Street, Suite 800 Memphis TN 38103
(Street) (City) (State) (ZIP)

YOU ARE HEREBY REQUIRED AND DIRECTED TO APPEAR BEFORE a Hearing Officer
of the National Labor Relations Board

at 810 Broadway, Suite 302

in the City of Nashville, TN

on Monday, October 21, 2024 at 10:00 a.m. or any adjourned

or rescheduled date to testify in Vanderbilt University, 10-RC-351808
(Case Name and Number)

And you are hereby required to bring with you and produce at said time and place the following books, records, correspondence, and documents:

SEE ATTACHMENT

If you do not intend to comply with the subpoena, within 5 days (excluding intermediate Saturdays, Sundays, and holidays) after the date the subpoena is received, you must petition in writing to revoke the subpoena. Unless filed through the Board's E-Filing system, the petition to revoke must be received on or before the official closing time of the receiving office on the last day for filing. If filed through the Board's E-Filing system, it may be filed up to 11:59 pm in the local time zone of the receiving office on the last day for filing. Prior to a hearing, the petition to revoke should be filed with the Regional Director; during a hearing, it should be filed with the Hearing Officer or Administrative Law Judge conducting the hearing. See Board's Rules and Regulations, 29 C.F.R. Section 102.31(b) (unfair labor practice proceedings) and/or 29 C.F.R. Section 102.66(f) (representation proceedings) and 29 C.F.R. Section 102.2(a) and 102.2(b) (time computation and timeliness of filings). Failure to follow these rules may result in the loss of any ability to raise objections to the subpoena in court.

B-1-1MO8AYH

Under the seal of the National Labor Relations Board, and by direction of the Board, this Subpoena is

Issued at Nashville, TN

Dated: October 04, 2024



Lauren McFerran
Lauren McFerran, Chairman

NOTICE TO WITNESS. Witness fees for attendance, subsistence, and mileage under this subpoena are payable by the party at whose request the witness is subpoenaed. A witness appearing at the request of the General Counsel of the National Labor Relations Board shall submit this subpoena with the voucher when claiming reimbursement.

PRIVACY ACT STATEMENT

Solicitation of the information on this form is authorized by the National Labor Relations Act (NLRA), 29 U.S.C. § 151 et seq. The principal use of the information is to assist the National Labor Relations Board (NLRB) in processing representation and/or unfair labor practice proceedings and related proceedings or litigation. The routine uses for the information are fully set forth in the Federal Register, 71 Fed. Reg. 74942-43 (Dec. 13, 2006). The NLRB will further explain these uses upon request. Disclosure of this information to the NLRB is mandatory in that failure to supply the information may cause the NLRB to seek enforcement of the subpoena in federal court.

Case 10-RC-351808

B-1-1M08AYH

RETURN OF SERVICE

I certify that, being a person over 18 years of age, I duly served a copy of this subpoena

- by person
- by certified mail
- by registered mail
- by private delivery service
- by any other means of service authorized by law, specifically

(Check method used.)

by leaving copy at principal office or place of business at

on the named person on

(Month, day, and year)

(Name of person making service)

(Official title, if any)

CERTIFICATION OF SERVICE

I certify that named person was in attendance as a witness at

on

(Month, day or days, and year)

(Name of person certifying)

(Official title)

SUBPOENA ATTACHMENT

1. All documents or other records, including handbooks, which show the job descriptions, job duties, and job qualifications, including educational and other training requirements, for all individuals in the petitioned-for Unit for the period August 1, 2022, through the present.
2. Copies of all letters of appointment, offer letters, or other communications informing individuals enrolled as graduate students at Vanderbilt University that they are to provide instructional services at Vanderbilt University during the 2022 - 2025 academic years.
3. Copies of all letters of appointment, offer letters, or other communications informing individuals enrolled as graduate students at Vanderbilt University that they are to provide research services at Vanderbilt University during the 2022 - 2025 academic years.
4. Copies of all letters of appointment or other communications informing individuals enrolled as graduate students at Vanderbilt University that they are to provide administrative services at Vanderbilt University during the 2022 - 2025 academic years.
5. Copies of all letters of appointment or other communications informing individuals enrolled as graduate students at Vanderbilt University that they are to receive payment from Vanderbilt University, including all conditions and requirements for the receipt of such payments.
6. All records, including but not limited to payroll records, benefit plan summaries, summary plan descriptions, and benefit administration records for the 2022- 2023, 2023 - 2024, and 2024 - 2025 academic years, showing in regard to all petitioned-for-employees their names, job classifications, job codes, departments, rates of compensation, including fellowship payments and other financial aid, dates of hire, weekly hours worked, and benefits received.
7. Copies of all documents setting forth policies, procedures, or guidelines regarding payments to graduate students, including but not limited to salaries, stipends, payments for living expenses or any other payments. Please provide, in response to this paragraph, *inter alia*, documents setting forth conditions for receiving payments, and documents regarding the form and manner in which such payments are made.
8. All documents setting forth guidelines, directives or requirements for enrolled graduate students providing instructional services for Vanderbilt University for the period August 1, 2022, through the present.
9. All documents setting forth the policies of Vanderbilt University regarding the selection and placement of graduate students in research, instructional, and administrative positions as for which they receive payments from Vanderbilt University.
10. All documents explaining Vanderbilt University's policies and procedures governing the application for and administration of sponsored research grants, training grants and

departmental research grants in effect during the period August 1, 2022, through the present.

11. All guidelines, instructions and suggestions for faculty members to apply for research grants issued or made available to faculty members during the period August 1, 2022, through the present.
12. All guidelines, instructions and suggestions for graduate students to apply for grants, including research and fellowship grants, issued or made available during the period August 1, 2022, through the present.
13. Copies of all grant proposals and/or applications made to external agencies and/or firms (along with supporting documentation) by Vanderbilt faculty for which funding was received or is being received during fiscal years 2022 - 2024.
14. Copies of all correspondence relating to the grants described in paragraphs 12 and 13, including but not limited to documents calling for modification to grant proposals or showing approval of the grants.
15. A list of all sponsored research accounts held by Vanderbilt University, including the name of the sponsoring institution, the total financial award granted and the length of the award for the fiscal years 2022 - 2024.
16. All documents showing the source of funding for each fellowship offered to graduate students at Vanderbilt University, including documents showing conditions placed on such fellowships and all requirements for such fellowship.
17. All documents relating to or setting forth Vanderbilt University's policies regarding bonuses or extra payments to doctoral students who obtain fellowships, training grants, or other outside funding.
18. All internal studies, reports and documents showing the relationship between Vanderbilt University's general revenue and budget and sponsored research accounts.
19. All Financial reports, income statements, and other documents showing the sources of income to Vanderbilt University utilized to fund the graduate program and the amounts received from each such source for the fiscal years 2022 - 2024.