

**IN THE
UNITED STATES COURT OF APPEALS
FOR THE THIRD CIRCUIT**

SAGE HOSPITALITY RESOURCES,
LLC,

Appellant,

v.

H.E.R.E. LOCAL 57,

Appellee.

CASE NO. 03-4168

**DECLARATION OF FAITH JETTER IN SUPPORT OF MOTION TO
INTERVENE OR, ALTERNATIVELY, TO FILE A BRIEF AMICUS
CURIAE**

Faith Jetter, pursuant to Section 1746 of the Judicial Code, 28 U.S.C. §1746,
declares as follows:

1) I am an employee of Sage, employed at the Renaissance Hotel ("Hotel") in Pittsburgh. I became employed at the Hotel in February, 2001, as part of the initial employee orientation. The Hotel opened for business shortly after I was hired. At the Hotel, I work as a housekeeping inspectress.

2) I know that Local 57 of the Hotel Employees and Restaurant Employees Union ("HERE") has been trying to unionize myself and other employees of the Hotel.

3) I heard that the Hotel and the HERE union signed an agreement covering the union's attempt to organize the employees of the Hotel. I also learned that this agreement required my employer to give the HERE union a list of employees' names and addresses, and access to the employees inside of the Hotel. No one asked me if I approved of this, and I do not. I am opposed to the Hotel giving the HERE union a list with my name and personal information, and allowing them access to me in the workplace.

4) I was called at home and also contacted in person by HERE union representatives and urged to sign a union authorization card. These union representatives already had my name and home address and telephone number. I was asked if the union representatives could come to my home and make a presentation about the union. I allowed them to come, as I was willing to listen.

5) Two union representatives came to my home and made a presentation about the union. They tried to pressure me into signing the union authorization card, and even offered to take me to out dinner. I refused to sign this card as I had not yet made a decision at that time.

6) Shortly thereafter, the union representatives called again at my home, and also visited my home again to try to get me to sign the union authorization card. I finally told them that my decision was that I did not want to be represented by this

union, and that I would not sign the card.

7) Despite the fact that I had told the union representatives of my decision to refrain from signing the card, I felt like there was continuing pressure on me to sign. These union representatives and others were sometimes in and around the hotel, and would speak to me or approach me when I did not want to speak with them. I also heard from other employees that the union representatives were making inquiries about me, such as asking questions about my work performance. I found this to be an invasion of my personal privacy. Once when I was on medical leave and went into the hospital, I found that when I returned to work the union representatives knew about my hospitalization and my illness. I felt like their knowledge about me and my illness was also an invasion of my personal privacy.

8) I also saw the union representatives try to coerce another employee to sign a card, even though they never explained to the employee what this card meant, or told her that the union could be able to be automatically recognized as the representative of the employees without a secret ballot election. It was clear to me that this employee had no idea what this card meant when the union tried to get her signature.

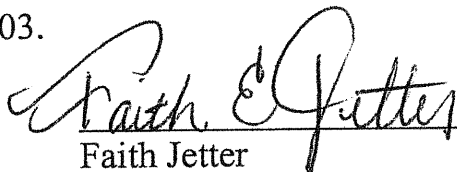
9) I do not care what decision any employee makes regarding whether or not to

be represented by the HERE union, but I think it is each employee's individual choice, to be made with full knowledge of what that choice means. I also believe that an employee's decision to say "no" should be respected, without pressure or coercion by the union.

10) If this union was going to come into the workplace, I would absolutely want to have a secret ballot election so that me and my fellow employees could vote our consciences in private, without being pressured by the union representatives. I would also want to hear all sides of the story, not just the union's side.

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

Executed on November 19, 2003.


Faith Jetter