

COMMONWEALTH OF MASSACHUSETTS

DEPARTMENT OF LABOR RELATIONS

FERRUCCIO ROMEO)
v.)
TOWN OF WINTHROP)

Case Number: MUP-14-4210 and MUP-15-4652

ANSWER

COUNT ONE

1. The Town admits Paragraphs 1, 2, 3, 4, 5 of the Complaint.
2. The Town denies Paragraph 6 of the Complaint.
3. The Town admits Paragraphs 7 and 8 of the Complaint.
4. The Town denies Paragraph 9, 10, 11, 12 and 13 of the Complaint.

FIRST AFFIRMATIVE DEFENSE

The charging party's claims are barred to the extent that they fail to establish a violation of Chapter 150E.

SECOND AFFIRMATIVE DEFENSE

The charge is untimely and barred by the applicable statute of limitations.

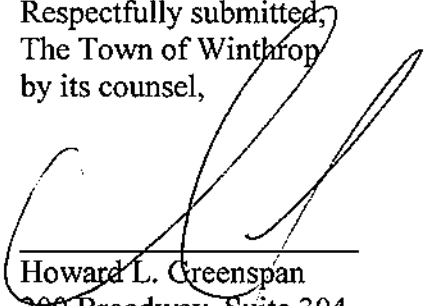
THIRD AFFIRMATIVE DEFENSE

The Complaint fails to state a claim upon relief may be granted.

FOURTH AFFIRMATIVE DEFENSE

The Respondent has complied with all laws and regulations and otherwise satisfied its statutory obligations under G.L. Chapter 150E.

Respectfully submitted,
The Town of Winthrop
by its counsel,



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