

NEBRASKA ASSOCIATION OF	)	
PUBLIC EMPLOYEES LOCAL 61	)	
of the AMERICAN FEDERATION	)	
OF STATE, COUNTY, AND	)	
MUNICIPAL EMPLOYEES,	)	
	)	
	)	
Petitioner,	)	CASE NO.
	)	
v.	)	PETITIONER'S REQUESTS FOR
	)	ADMISSION TO THE
COUNTY OF RICHARDSON a	)	RESPONDENT
political subdivision, and	)	
RICHARDSON COUNTY	)	
BOARD OF COMMISSIONERS,	)	
JOHN J. CAVERZAGIE, BOB	)	
CAMPBELL, RICK KARAS,	)	
	)	
Respondent.	)	

TO: COUNTY OF RICHARDSON, ET AL., Respondent:

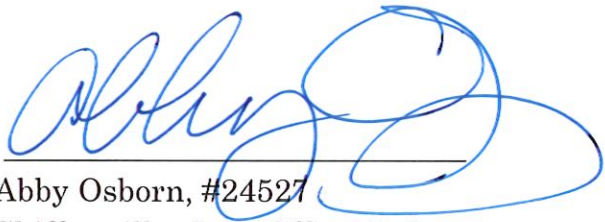
REQUESTS FOR ADMISSION

1. Admit that the GPS system tracking intended for use in the County Road equipment and/or machinery is the same GPS tracking system factory installed in each piece of equipment and/or machinery.
2. Admit that the technology of the GPS system tracking intended for use at the Richardson County Road Department is the same as it has been since each piece of equipment was procured by the Respondent.

3. Admit that the Union was not consulted prior to the initial intended implementation of GPS and/or AI integrated camera systems by the County.
4. Admit that the Respondent has not been GPS and/or AI integrated camera systems prior to March 20, 2026.
5. Admit that there were no proposals regarding the use of GPS and/or AI integrated camera systems during the negotiations for the 2023-forward Collective bargaining agreement.
6. Admit that there is no written policy or procedure related to the use of GPS and/or AI integrated camera systems by the Respondent as of July 7, 2026.
7. Admit that there is no written policy or procedure related to the use of GPS and/or AI integrated camera systems by the Respondent as of March 20, 2026.
8. Admit that there is no written policy or procedure related to the use of GPS and/or AI integrated camera systems by the Respondent as of May 1, 2026.

DATED July 7, 2026.

NEBRASKA ASSOCIATION OF
PUBLIC EMPLOYEES LOCAL 61
of the AMERICAN FEDERATION
OF STATE, COUNTY, AND
MUNICIPAL EMPLOYEES,
Petitioner,

By: 

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the above and foregoing was served upon the Respondent on July 7, 2026 by including same with the Petition, Notice of Pendency and Certificate of Service.

s/Abby Osborn

Abby Osborn