

**IN THE COURT OF COMMON PLEAS OF ERIE COUNTY, PENNSYLVANIA**

WABTEC CORPORATION, ) CIVIL DIVISION  
)  
Plaintiff, ) GD No. 11792-23  
)  
v. )  
)  
UNITED ELECTRICAL RADIO & )  
MACHINE WORKERS OF AMERICA, )  
LOCAL NO. 506, )  
)  
and )  
)  
UNITED ELECTRICAL RADIO & )  
MACHINE WORKERS OF AMERICA, )  
LOCAL NO. 618, )  
)  
Defendants. )

COMMON PLEAS COURT  
ERIE, PA  
2023 AUG -3 AM 11:29  
CLERK OF RECORDS  
PROTHONOTARY

**CONSENT ORDER OF COURT GRANTING INJUNCTIVE RELIEF**

AND NOW, this third day of August, 2023, it is hereby ORDERED, ADJUDGED and DECREED that Defendants, their agents, members, servants, consultants, officers, directors, attorneys, affiliates, successors and assigns, and any other individual or entity within their control or supervision and all other persons or entities acting in concert with them or on their behalf or participating with them, are enjoined until further Order of Court from, directly, or indirectly:

- a. Interfering with the business activities of Wabtec, its officers, agents, employees, representatives, and others having business with Wabtec, by threatening, obstructing, intimidating, or harassing any such person or entity;
- b. Engaging in physical violence or vandalism of any nature at or in the proximity the manufacturing facility located in Erie, Pennsylvania (the "Wabtec Property");
- c. Picketing at any entrance to any Wabtec Property with more than ten (10) pickets, which shall be spaced at least 10 feet apart feet apart and remain in motion;

- d. Loitering, grouping or congregating in any manner at any location within 10 yards of any gate or driveway leading to any Wabtec Property;
- e. Active protesting, rallying, or demonstrating in any manner, except as provided in Paragraph (c) of this Order, at any location within 30 yards of any gate or driveway leading to any Wabtec Property;
- f. Entering onto, using, or remaining on Wabtec Property for any reason other than performing their duties as employees of Wabtec with the consent and pursuant to the direction of Wabtec;
- g. Utilizing mirrors, lights (including lasers, flashlights, and headlights) or physical barriers (including sandwich boards, cornhole boards, signs and flags) to distract or interfere with the vision and driving capabilities of vehicles traveling into or around Wabtec Property;
- h. Blocking or hindering any person from entering or exiting Wabtec Property, including by patrolling, walking, standing, laying in, or otherwise restricting the flow of traffic entering or exiting Wabtec Property or by obstructing the view of persons entering or exiting Wabtec Property;
- i. Dropping, placing, throwing, spreading or otherwise causing debris (including nails, glass, cinder blocks, spikes, or other objects) to be strewn in, on or about Wabtec Property (including any driveways, parking lots, entrances, exits, and adjoining roads);
- j. Following non-striking Wabtec employees or business invitees of Wabtec as they travel to or from Wabtec Property;
- k. Videotaping, photographing or recording, in any manner, the likeness of any individual entering or exiting Wabtec Property;
- l. Intimidating those seeking to enter Wabtec Property by videotaping, photographing, or recording, in any manner, vehicles or license plate numbers of vehicles entering or exiting Wabtec Property;
- m. From picketing en masse at or in the vicinity of Wabtec Property;
- n. Engaging in any other disturbances designed to disrupt the business of Wabtec, its employees, contractors, vendors, customers, and others; and
- o. Instigating or inducing others to do any one or more of the foregoing acts.

It is further ORDERED that Defendants:

- a. Continue their practice of appointing a Picket Line Captain for each picket shift at each gate or entrance to Wabtec Property to oversee the activities of all

picketers to ensure that all orders of the Court and the laws of the Commonwealth of Pennsylvania are being obeyed in all respects; and

- b. Continue to maintain an accurate Picket Log of the names and addresses of all individuals serving on the picket line and the date and the time of day that each picket has served. The Picket Log shall include the name of a designated Picket Line Captain for each picket shift and shall be available for review by the Court and any appropriate law enforcement agency (including the Pennsylvania State Police, Erie County Police, and Lawrence Park Police) to ensure that all orders of the Court are fully obeyed.

It is further ORDERED that, pursuant to 43 P.S. § 206n, Wabtec and its agents or employees shall be enjoined from any and all acts or threats of violence, intimidation, coercion, molestation, libel or slander against the Defendants engaged in the labor dispute.

It is further ORDERED that:

- a. The Erie County Sheriff, Lawrence Park Township Police, Erie City Police, Pennsylvania State Police or any other law enforcement agency having jurisdiction over the enjoined parties are authorized and directed to serve copies of Wabtec's Complaint in Equity, Motion for Preliminary Injunction, and any subsequent Order of Court upon the Defendants and to post copies of this pleading and any subsequent Order at each gate, entrance, or walkway used to enter or exit the Wabtec Property;
- b. The Erie County Sheriff, Lawrence Park Township Police, Erie City Police, or any other law enforcement agency having jurisdiction over the enjoined parties are authorized and directed to enforce this injunction by whatever lawful means deemed appropriate and to arrest any individuals interfering with enforcement of this Order;
- c. Defendants shall make immediate and diligent efforts to publicize the terms of this Order to their members, officers, and affiliates so that their members and all others acting on behalf of or in support of Defendants will be aware of said terms.
- d. This Court will retain jurisdiction over the matter to determine whether the Court's decree has been obeyed.

SO ORDERED BY THE COURT:

  
HONORABLE ERIN CONNELLY MARUCCI

I, Aubrea Hagerty-Haynes, Prothonotary of the Court of Common Pleas of Erie County, PA., do certify that this is a true and correct copy of the original record filed in said court.

  
Prothonotary:

8/3/23

Deputy: