



November 1, 2022

VIA EMAIL

Lynne Fox, International President
Workers United, an SEIU Affiliate
22 South 22nd Street
Philadelphia, PA 19103

RE: Response to October 27, 2022 Letter Requesting First Contract Negotiations for Particular Stores

Dear Ms. Fox:

This letter responds to your letter dated October 27, 2022 that requests “first contract” bargaining regarding Starbucks stores listed in the Attachment A accompanying your letter, and your letter included multiple requests for information listed in the Attachment B accompanying your letter. For ease of reference, accompanying this letter as [Appendix 1](#) is your October 27 letter and Attachments A and B.

As you know, at every Starbucks store where Workers United has representation rights, Workers United insisted on treating each separate store as a distinct bargaining unit. This means the law requires both sides to negotiate in good faith for each group of partners at every location, with each store having its own set of meetings specific to the represented partners who work in that individual store. Therefore, we believe the request in your October 27 letter – asking that “Starbucks meet with us to negotiate a first contract setting forth guaranteed terms and conditions of employment covering these workplaces” – is inappropriate. To repeat, Starbucks will meet its legal obligations and engage in good faith bargaining for each single-store unit that has been certified; we do not agree with your repeated demand for one contract covering the union-represented stores.

Regarding your requests for bargaining – which must occur separate for each single-store location where Workers United certifications have become final – our locally designated representatives will proceed with moving forward to make bargaining arrangements consistent with the same manner in which these issues have been addressed at other represented Starbucks stores. Based on the substantial variation that exists among different Starbucks stores, the dates, starting times, locations and other in-person meeting arrangements for each store must be addressed at the local level. Accordingly, we have identified in [Appendix 2](#) to this letter the names and contact information for the designated Starbucks representative(s) who will be responsible for making these arrangements for every single-store location, along with additional individuals representing Starbucks who should be copied regarding bargaining for specific stores.

The designated Starbucks representatives will reach out as soon as possible to the particular person(s) designated by Workers United who will be responsible for addressing arrangements and bargaining regarding each single-store location. However, your October 27 letter did not identify these designated Workers United representatives. Please send this information as soon as possible, so that the Starbucks representatives identified in Appendix 2 can contact the Workers United representatives to work out the arrangements regarding each set of negotiations.

We will respond separately, in the near future, to the information requests accompanying your October 27, 2022 letter. Therefore, regarding the stores identified above, we believe you already have the requested information and

relevant objections. However, if you believe our existing responses are deficient or must be supplemented in any way, let us know immediately and we will give further good faith consideration to any issues that you raise.

As you know, we have already made arrangements for many sets of bargaining meetings relating to various Starbucks stores, and bargaining has not commenced at other stores where Workers United certifications remain in dispute. It is possible that some stores identified in your Attachment A fall into one of these two categories, which we will be verifying after sending this response.

We will leave it to our respective designated representatives to address all of the details regarding bargaining dates, times, locations, scheduling and participants, consistent with our view that these issues must be addressed differently for particular stores, in-person only. Accordingly, nothing in this letter should be regarded as accepting or otherwise passing on any of the specific proposed arrangements referenced in your October 27 letter and/or other communications.

Sincerely,

A handwritten signature in black ink, appearing to read 'May Jensen', with a long, sweeping flourish extending to the right.

May Jensen
vice president, partner resources

Appendix 1 – Letter dated October 27, 2022 from Lynne Fox to May Jensen (with Attachments A and B to that letter)
Appendix 2 – Names and contact information for designated Starbucks representative(s) for every single-store location, and additional individuals representing Starbucks who should be copied