

QUESTIONS TO ASK POTENTIAL CLASS DEFENDANT PARISHES

- A. Basic information: (1) name of Parish; (2) # firefighters for the past 4 (four) years, especially the three (3) year period between May 1, 2005, and May 1, 2008.
- B. Case Specific Questions
1. What work period does the Parish use to determine overtime for its firefighters (from 7 to 28 days)?
 2. How often does the Parish pay firefighters; *i.e.*, once per month, semi-monthly, or bi-weekly?
 3. What components does the Parish use to calculate retirement benefits for firefighters; *i.e.*, base salary, longevity, EMT pay, college incentive pay, scheduled overtime, etc.?
 4. What components does the Parish use to calculate the regular rate of pay for overtime purposes?
 5. Does the Parish count sick or vacation time as hours worked for purposes of calculating overtime?
 6. Did the Parish receive any memorandum, letter, or notice from the Firefighters' Retirement System instructing the Parish to include "scheduled overtime" as a component in the calculation of retirement benefits for firefighters? If yes,
 - a. List the dates of the letters;
 - b. Identify to whom the letters are addressed;
 - c. Identify who sent the letters.
 7. Did the Parish know to include "scheduled overtime" as a component in the calculation of a firefighters' retirement benefits?
 - a. If yes, how, when, from whom, and how long has the Parish known?
 8. Did the Parish include "scheduled overtime" as a component in the calculation of a firefighters' retirement benefits?
 - a. If yes, since when?
 - b. If not, why not?
 9. Who will be available to testify as to the Parish's method of calculating a firefighters' retirement benefits? Please list the name, address, telephone number, and e-mail address.

10. Does the Parish record a firefighters' actual hours worked, vacation time, sick time, compensatory time, etc., electronically?
 - a. If so, in what format - i.e., Excel, etc.?
11. If the Parish does not record a firefighters' hours worked electronically, how does the Parish record the hours worked; *i.e.*, manually or some other method?
12. Who at the Parish would be the best person to speak with regarding contributions to the Parish's firefighters' retirement system? Please identify the name, address, telephone number, and e-mail.
13. Please provide an organizational chart, which shows ranks, lines of authority/responsibility by position.