

**BEFORE THE NATIONAL LABOR RELATIONS BOARD
REGION 2**

In the Matter of

Trustees of Columbia University
In the City of New York,

Employer,

Case No.: 02-RC-225405

and

Columbia Postdoctoral Workers
and United Automobile,
Aerospace, and Agricultural
Implementation Workers of
America (CPW-UAW),

Petitioner.

BRIEF OF PETITIONER

I. INTRODUCTION

This petition, filed by Columbia Postdoctoral Workers and United Automobile, Aerospace and Agricultural Implement Workers of America (CPW-UAW) seeks an election in a unit of some of the most highly educated employees in the world. The Petitioner seeks to represent researchers employed by the Trustees of Columbia University in the City of New York (“Columbia,” “the University,” or “the Employer”) who have been awarded a doctoral or equivalent degree (Bd. Ex. 1(b)). During the hearing, the Petitioner moved, without objection, to amend the petition to read:

Included: All postdoctoral researchers who have received a doctorate or its professional equivalent who provide services to the University, including Postdoctoral Research Scientists/Scholars, Postdoctoral Fellows, and Associate Research Scientists at all of the Employer’s facilities.

Excluded: All other employees, Postdoctoral Clinical Fellows and Postdoctoral Residency Fellows guards and supervisors as defined in the Act.

(Tr. 19, 208-09).¹ The Petitioner requests that the Regional Director grant the Motion to Amend and direct an election in this case.

The employees in all of these classifications have obtained their PhD degrees or equivalent and are continuing to pursue original research at Columbia. The University appoints recent recipients of doctoral degrees to positions as Postdoctoral Officers of Research (Er. Ex. 1; Tr. 60-61). This category includes Postdoctoral Research Scientists, Postdoctoral Research Scholars, and Postdoctoral Fellows (collectively "Postdocs"). According to the Employer's Executive Vice President for Research, Dr. Graham Michael Purdy, Postdocs are individuals who recently obtained their Ph.D. degrees who are "engaged in research under the mentorship of a more senior faculty member." (Tr. 35). Postdoctoral Research Scientists and Scholars are paid by Columbia for conducting this research from grant funds obtained by that senior faculty member, commonly referred to as the Principal Investigator or "PI." (Tr. 52). Postdoctoral Research Scientists work in the sciences or engineering, while those who work in the social sciences or humanities are classified as Postdoctoral Research Scholars (Tr. 87). The term Postdoctoral Research Fellow refers to Postdocs who are

¹ References to the record shall be as here indicated:
Transcript references shall be denoted as Tr. (followed by the page number(s))
Board Exhibits shall be denoted as Bd. Ex. (followed by the exhibit number)
Employer Exhibits shall be denoted as Er. Ex. (followed by the exhibit number)
Petitioner Exhibits shall be denoted as Pet. Ex. (followed by the exhibit number)

paid by Columbia from grants applied for and awarded to support the Fellow's research and who conduct research under the supervision of a faculty member (Er. Ex. 1, p. 2).²

An Associate Research Scientist or Scholar is also required to have a Ph.D., plus some experience as a Postdoc (Tr. 44). Associate Research Scientists and Scholars (collectively "ARSs") are classified by the University as Professional Officers of Research.³ Again, Associate Research Scientists conduct research in the sciences and engineering, while Scholars are in the social sciences and humanities (Tr. 42). Purdy described the ARS position as a "next position" for a Postdoc (Tr. 37).

The Employer contends that Postdoctoral Research Fellows are not employees of Columbia, notwithstanding that they work under the direction and supervision of PIs who are University employees and receive monthly pay from the University. The Employer also argues that the ARSs lack a community of interest with the Postdocs because the latter are "in training" and are employed on a temporary basis. The record establishes, however, that ARSs and Postdocs work side-by-side in the same laboratories performing similar work under the direction of the same PIs. All are appointed to their positions by the University for one-year periods, and more than ½ of the current ARSs were previously employed as Postdocs. Therefore, the Regional Director should direct an election in the petitioned-for unit, as amended.⁴

² Postdoctoral Clinical Fellows and Postdoctoral Residency Fellows are also appointed as Postdoctoral Officers of Research (Er. Ex. 1). The parties agreed to exclude them because they generally hold medical degrees and work with patients rather than conducting pure research (Er. Ex. 1; Tr. 18-19).

³ Research Scientists and Senior Research Scientists are also appointed Professional Officers of Research. No party contends that they should be included in the unit.

⁴ The Employer also took the position that all Postdocs are "merely 'trainees'" who do not have the right to organize because the University provides them with training resources (Er. Ex. 10). In support of this argument, the Employer relies upon *Cedars-Sinai Medical Center*, 223 NLRB 252 (1976) and *St.*

II. FACTS

Columbia is a nonprofit postsecondary education institution located in New York City. As of 2015, it received more than three-quarters of a billion dollars per year in revenues from government contracts and grants. See *The Trustees of Columbia University in the City of New York*, 364 NLRB No. 90 at 13 (2016) (“*Columbia*”). The employees involved in this case perform work necessary to earn these grants.

Postdoctoral Research Scientists and Scholars (collectively “PRs”) are appointed as Officers of Research of the University for terms of one year. They may be reappointed for two additional one-year terms, although occasional exceptions are made to this three-year limit (Er. Ex. 1, p. 2; Tr. 51). According to Purdy, all Postdocs, including PRs, perform “high quality research” in a PI’s laboratory (Tr. 37). He described them as “one of the greatest idea-generating engines that we have.” (Tr. 35). PRs are paid a bi-monthly salary, like other employees of the University, and are offered the same benefits as other employees (Er. Ex. 1, p. 2; Tr. 54, 108-09). The minimum salary for a PR is \$50,123 (Pet. Ex. 1, p. 2 of 3).

Postdoctoral Fellows (“Fellows”) are also appointed Officers of the University for one-year terms, renewable subject to the same three-year limit as PRs (Er. Ex. 1, p. 2). Postdocs move between PR and Fellow positions, depending upon how their research is being funded at a particular time. The three-year limitation applies to their total time in one of the two categories (Tr. 66-67; Er. Ex. 1, pp. 5-6). Fellows are paid a monthly “stipend” rather than a bi-weekly salary, supported by a grant awarded to the

Clair’s Hospital and Health Center, 229 NLRB 1000 (1977), two cases that were overruled nearly 20 years ago in *Boston Medical Center*, 330 NLRB 152 (1999). The Regional Director ruled that he would not take evidence on this contention or allow briefing of this issue (Tr. 182-83).

University to support the Fellow's research. The funding entity supplies the funds to the University, which then performs the "payroll functions" necessary to distribute the funds to the Fellow (Tr. 75, 101, 114-15).⁵ Fellows are offered one of the three health insurance options that are offered to other employees of the university, including PRSs and ARSs (Tr. 109). The University has established a minimum stipend of \$48,432 for fellows, based upon guidelines set by the National Institutes of Health ("NIH"). (Pet. Ex. 1). If a Fellow has been awarded a fellowship that falls below this minimum, the University pays a salary to the Fellow to cover the difference (Pet. Ex. 1; Tr. 112-13).

The Employer's Handbook states that Postdocs "are appointed primarily to further their professional training...." (Er. Ex. 1, p. 5). The University offers workshops for Postdocs in a range of areas, from leadership courses to how to write a resume to yoga (Tr. 81-82, 107). None of these workshops are mandatory (Tr. 107). Postdocs are not working toward any degree (Tr. 54). Indeed, since a Postdoc has already been awarded a Ph.D., he or she already has "the degree that you would take as your last steps in education, that you wouldn't expect to go beyond that. In most cases, there isn't much beyond that." (Tr. 106). All Postdocs spend the "vast majority of their time" actually conducting research (Tr. 65).

Associate Research Scientists and Scholars are junior officers of research who are also appointed for a one-year term which is renewable (Er. Ex. 1, p. 2). ARSs are required to have a Ph.D. and usually some experience as a Postdoc (Tr. 44). ARSs are hired to help to fulfill the PI's research obligations (Tr. 44-45). Like the PRSs, they are paid a bi-monthly salary, and they receive the same benefits as PRSs (Tr. 48, 57). The

⁵ There are some Fellows who receive their payments directly from the funding source, but this is "quite rare." (Tr. 102).

minimum salary for ARSs has been set by the University at \$56,300, \$6,000 more than the minimum for PRSs (Pet. Ex. 1, p. 1).

Postdocs and ARSs all work under the direction and supervision of a PI (Tr. 64-65, 75-76). The PI is responsible for ensuring the quality and effort of the work done by PRSs, Fellows and ARSs, for ensuring that they all comply with federal and state regulations, and that they communicate appropriately about their work (Tr. 59-60). PRSs, Fellows and ARSs are required to assign to the University the rights to any intellectual property generated by their research (Tr. 63-64; Pet. Ex. 2). While there are differences in the posting processes for hiring Postdocs as opposed to ARSs, the critical elements of the hiring process are the same. The principal role in selecting an ARS or a Postdoc lies with the PI who will be responsible for his work, subject to approval by the head of the department and the provost (Tr. 47, 51, 97-99). While the Employer offered testimony that it has an affirmative action policy that applies to ARSs (Tr. 46), Purdy testified that the Employer has a university-wide program focused on improving diversity in all segments of the university, including ARSs and Postdocs (Tr. 69-70).

Associate Research Scientists/Scholars, Postdoctoral Research Scientist/ Scholars and Postdoctoral Fellows perform essentially the same type of work. Postdoctoral Fellows, Associate Research Scientists and Associate Research Scholars work together in the same laboratories for the same PIs (Tr. 66). ARSs, PRSs and Fellows must sign an offer letter that describes the nature of the research to be conducted (Er. Ex. 2, 5, 7; Tr. 47-47, 110)⁶. While each works on her own research project, all of the research is a component of the PI's research (Tr. 66). One of the major objectives for both Postdocs

⁶ While not reflected on the index page of the transcript, Employer Exhibit 7 was received into evidence (Tr. 100).

and ARSs is to publish papers with their PIs, reporting the results of their research (Tr. 69). The compensation of ARSs and PRSs is funded from the same grants awarded to their PIs. While ARSs have more experience than most Postdocs and, as noted, service as a Postdoc is usually a prerequisite to serving as an ARS, Purdy testified that all work on their research projects with the same degree of independence (Tr. 68). Purdy further testified, "The Postdoc is obviously working on research projects in the PI's lab in the same way that an Associate Research Scientist is." (Tr. 45). According to Purdy, the distinction between a Postdoc and an ARS lies, not in the nature of the work, the supervision provided, or the independence of the worker, but in their mentality. According to him, the Postdoc is "interested" in developing a career and becoming a PI, while the ARS is just doing a job (Tr. 43, 45-46). He acknowledged that many ARSs are dedicated to becoming PIs, and "the university is totally supportive of that." (Tr. 68-69). He also acknowledged that this did not result in any difference in the nature of their work, that "they would be doing similar things." (Tr. 45).

Manu Vanaerschot is an ARS in the Department of Microbiology and Immunology (Tr. 129). He was hired as a PRS in the laboratory of Dr. David Fidock in March 2015 (Tr. 130). His offer letter described in considerable detail the work he was hired to do: studying antibacterial resistant malaria parasites and working to develop new treatments (Pet. Ex. 3; Tr. 129-131). In August 2017, the results of Dr. Vanaerschot's research were published in a scientific journal (Tr. 132). Following publication, Dr. Vanaerschot approached his PI, Dr. Fidock, and asked for a salary increase. Instead, Dr. Fidock proposed a promotion to ARS. The process for this promotion was completed in December 2017. After his promotion, Dr. Vanaerschot

continued to conduct the research described in his original offer letter (Tr. 133). The only change was a higher salary (Tr. 134).

Dr. Fidock's laboratory employs 3 ARSs, 4 Postdocs, 3 graduate student employees and some support personnel (Tr. 135). The work of the laboratory is supported primarily by grants obtained by Dr. Fidock. The ARSs and Postdocs work on specific research projects within the overall field of antibacterial resistant malaria. They hold weekly meetings at which one of them will describe the progress in their research, and the others will offer suggestions.

Dr. Vanaerschot is not the only ARS who started in this laboratory as a Postdoc. Dr. Nina Gnadig was a Postdoc in the lab for three or four years. She was promoted to an ARS so that she could continue her research without running afoul of the University's limits on the length of an appointment as a Postdoc (136-37, 139-40).

This experience in Dr. Fidock's laboratory of promotions from PRS to ARS is not unusual. Of the 1017 ARSs on the list provided by the Employer with its Statement of Position (Bd. Ex. 3), 518, or more than half, had previously been employed by the University as Postdocs (Pet. Ex. 4; Tr. 178-79).

Tulsi Patel is a Postdoctoral research fellow in the Department of Pathology and Cell Biology, conducting research in the laboratory of Dr. Hynek Wichterle (Tr. 157). Dr. Patel was awarded her Ph.D. from Columbia in May 2016 (Tr. 158). While she was still working on her doctorate, she began applying for postdoctoral positions in New York City, including three laboratories at New York University and Dr. Wichterle's lab at Columbia. She was interviewed by the PIs at all four labs and was offered positions at all four (Tr. 159). She decided to accept the job offer from Columbia because Dr.

Wichterle's research was the most compatible with her scientific interests (Tr. 159). Dr. Wichterle assured her that he had sufficient grant funding to hire her as a Postdoctoral Research Scientist, but he encouraged her to apply for fellowships because it would be good for her career to obtain her own funding (Tr. 160). In addition, of course, obtaining a fellowship grant would provide additional funding for the research conducted in Dr. Wichterle's lab (Tr. 160). Just a month before she was scheduled to start work for Dr. Wichterle, Dr. Patel was awarded a T32 grant from the NIH (Tr. 160-62). Thus, when she started work on June 15, 2016, she was classified by Columbia as a Postdoctoral Fellow rather than a PRS (160, 162).

As a Fellow, Dr. Patel conducted research into how motor neurons change with age and the relationship of these changes to ALS (Lou Gehrig's disease). She studied motor neurons in mice and in cultures taken from stem cells (Tr. 162). Dr. Patel's one-year fellowship expired in June 2017 (Tr. 163). She then became a PRS (Tr. 163). In that capacity, she conducted the same research under the direction and supervision of the same PI, Dr. Wichterle (Tr. 163). Three months later, she obtained a different kind of fellowship and transferred back to a position as a Postdoctoral Fellow (Tr. 163-64). Again, nothing changed with respect to her job (Tr. 164). The only difference between her time as a PRS and her time as a Fellow was the form of payment and a slight change in benefits (Tr. 164-65).

Dr. Wichterle's lab employs one PRS, one ARS, three graduate workers and two technicians (Tr. 165). The PRS and the ARS perform research similar to Dr. Patel's research relating to motor neuron development and its relationship to ALS, using mice and cell cultures (Tr. 165-66). Dr. Wichterle conducts weekly meetings at which the

researchers report on the progress of their research, and he meets individually with the researchers to discuss their work (Tr. 166-67).

Dr. Purdy testified that Postdocs move between Fellowship positions and PRS positions, depending upon awards of grants and the adequacy of the PI's funding (Tr. 66-67). The record establishes that, in fact, 44 employees on the Employer's list of unit employees are listed on the Employer's records as both PRSs and Fellows (Bd. Ex. 3).⁷

III. ARGUMENT

A. Postdoctoral Fellows are Employees of the University

The Employer contends that the Postdoctoral Fellows are not employees of Columbia because their research is funded by grants awarded based upon applications that they submitted, rather than applications submitted by their PIs. According to the Employer's attorneys, they are "in the nature of independent contractors" (Tr. 187). It is undisputed that, with the exception of a small number of Fellows, the grant funds are awarded to the University, and the University pays the Fellows monthly out of those funds. In this regard, the grant payments are similar to the grants awarded to PIs, which are paid to the University and expended to further the PIs research. The University admits that the PIs are employees of Columbia. Fellows are offered a health insurance benefit that is provided to other employees of the University. Their work is guided and directed and supervised by their PIs in the same manner as the work of admitted employees such as ARSs. Since they are compensated by the University and

⁷ The 44 employees listed in both categories are named in Appendix A attached to this brief. This list is taken directly from the Employer's Position Statement. Thus, for example, Yair Antman is listed in the Employer's position statement as a Postdoctoral Research Scientist and a Postdoctoral Fellow in the Ctr. Integrated Science & Engineering Department.

perform services under its direction and supervision, they are common law employees and therefore employees within the meaning of section 2(3) of the Act. *NLRB v. Hendricks County Rural Electric Membership Corp.*, 454 U.S. 170, 189-90 (1981); *Sure Tan, Inc. v. NLRB*, 467 U.S. 883, 891 (1984); *NLRB v. Town & Country Electric*, 515 U.S. 85, 94 (1995).

The fact that a Fellow has received a grant from a funding agency makes the Fellow more attractive as an employee of a university, just as a PI who has generated a large amount of grant funding is a more attractive employee. A Postdoc with funding is in a stronger position to negotiate terms of employment and is likely to have a wider range of employment options. This does not, however, establish that he is an independent contractor. The burden is on the Employer, in seeking to exclude the Fellows, to establish that they are independent contractors. *Minnesota Timberwolves Basketball*, 365 NLRB No. 124, sl. op. at 4 (2017); *BKN, Inc.*, 333 NLRB 143, 144 (2001). This requires a showing that the Fellows work independently, and that their work is not directed by the University. The undisputed evidence establishes that the work of Fellows is supervised by the University in the same manner as ARSs and PRSs. Therefore, the Employer has not met its burden.

When confronted with an issue of independent contractor status, the Board relies upon common-law agency principles, including the factors enumerated in the *Restatement (Second) of Agency* sec. 220 (1958). *Minnesota Timberwolves*, supra. These common law factors include: (1) the extent of control over the details, means and manner of the work; (2) whether the putative contractor is engaged in a distinct occupation or business; (3) whether the work is done under the direction of the

principal, or by a specialist without supervision; (4) the skill required in the particular occupation; (5) who supplies the tools and place of work; (6) the length of time for which the person is employed; (7) the method of payment, whether by the time or by the job; (8) whether the work is part of the regular business of the employer; (9) whether parties believe they are creating an employment or contract relationship; and (10) whether the principal is in business. The Board also considers whether the individuals in question are engaged in an intended business with entrepreneurial opportunity for gain or loss. *Minnesota Timberwolves*.⁸ Consideration of these factors reveals that the Fellows are clearly not independent contractors.

With respect to (1) the record establishes that the work of the Fellows is directed and supervised in the same manner as the ARSs who are admitted employees. The appointment letters (Er. Ex. 7) set out “the specifics” of the research to be performed by the Fellow. (2) The Fellows are not engaged in an independent occupation or business. They work exclusively at the University conducting research that is part of the research of their PI. (3) They work under the direction of their PI. While the Fellows are highly specialized researchers, their PIs are specialists in the same field. (4) The skills factor does not support independent contractor status because the PI supervising the Fellows possesses the same skill. (5) The Employer and the PI supply the instrumentalities, tools and the place of work, one of the hallmarks of an employment relationship. (6) The Fellows are employed for one-year periods, a factor favoring a finding of employee status. (7) While the Employer does not withhold taxes from the pay of Fellows, they are paid monthly, with a salary minimum set by the Employer. The amount of the

⁸ While Member Miscimarra dissented from the result in *Minnesota Timberwolves*, he agreed that these are the factors to be considered.

monthly payment is fixed and does not depend upon the amount of progress made in the research. They are not paid by the job. Therefore, this factor supports a finding of employee status. The fact that the Employer provides health insurance for the Fellows is further indicative of an employee relationship. (8) The work performed by the Fellows, original research, is a central part of the business of Columbia. (9) There is no evidence that the parties actually believe that they are creating an independent contractor relationship. None of the witnesses testified to such a belief, and even the Employer's counsel, in asserting its position, said that they were "in the nature" of independent contractors, but hesitated to make a flat claim of independent contractor status. (10) The principal, Columbia, is in the business of producing original research. The Fellows are working in the laboratory conducting research that is related to the PIs research. The work of the Fellows is thus a part of the work of the University. Finally, (11) the Fellows are not engaged in independent businesses. Indeed, the offer letters state that they are offered "fulltime" positions with the University (Er. Ex. 7). They have no opportunity to engage in independent research businesses outside the University. Thus, the factors relied upon by the Board overwhelmingly support a finding that the Fellows are employees.

This result is also dictated by the Board's decision in *The Trustees of Columbia University in the City of New York*, 364 NLRB No. 90 (2016). In that case, the Board rejected Columbia's argument that research assistants whose work was funded by training grants were not employees. Sl. op. at 18. The Board relied upon the fact that the money from the training grants was paid to Columbia and that Columbia oversees and directs the work of the research assistants who conduct the research. The same is

true of the Fellows. Therefore, they are employees entitled to organize a union pursuant to the procedures of the Act.

B. The Petitioned-for Employees Share a Community of Interest and Constitute an Appropriate Unit

Whether the petitioned-for unit is appropriate for purposes of collective bargaining requires a consideration of the community of interest factors traditionally considered by the Board. These factors include:

whether the employees are organized into a separate department; have distinct skills and training; have distinct job functions and perform distinct work, including inquiry into the amount and type of job overlap between classifications; are functionally integrated with the Employer's other employees; have frequent contact with other employees; interchange with other employees; have distinct terms and conditions of employment; and are separately supervised.

PCC Structural, Inc., 365 NLRB No. 160, sl. op. at 5 (2017), quoting *United Operations, Inc.*, 338 NLRB 122 at 123 (2002). These factors establish that the petitioned-for unit is appropriate.

The unit sought crosses all departments of the Employer's operations where research is conducted. Both Postdocs and ARSs have obtained the highest possible degree offered in the nation's educational system. They work in the same laboratories conducting similar research to one another. They work under the direction and supervision of the same PIs and perform work that is functionally integrated into the work of the laboratory. They attend meetings together to discuss each other's work. They share benefits and are paid comparable salaries. More than ½ of the ARSs have previously worked as Postdocs. Purdy described ARS as a "next" natural step for a Postdoc. Under

traditional community of interest standards, the petitioned-for employees share sufficient interests to constitute an appropriate unit.

The Employer argues that the Postdocs are primarily “trainees” and lack a community of interest with the ARSs because the latter “have a job.” The record establishes, however, that the work they do is virtually indistinguishable. While there are some workshops available for Postdocs that are not intended for the benefit of ARSs, Purdy acknowledged that Postdocs spend the “vast majority of their time” doing the work of their laboratories (Tr. 65). Postdocs have already achieved the highest possible level of educational achievement. The fact that they still have something to learn does not mean that they lack a community of interest with people doing the same type of work under the same working conditions. Indeed, individuals conducting research are, by definition, always striving to learn something new.

The Employer’s argument that the Postdocs lack a community of interest with the ARSs because the former are “temporary” employees is similarly unpersuasive. All employees in the petitioned-for unit are hired for one-year terms, which may be renewed. The only distinction between ARSs and Postdocs is that the Employer’s policies limit the period of a Postdoc’s employment at Columbia to three years. After the completion of three years, she may continue her research at Columbia, but she must do so as an ARS. Thus, more than half the ARSs were previously employed as Postdocs. The fact that such a large portion of the unit has previously worked as Postdocs clearly demonstrates that Postdoc positions can lead to continuing employment as ARSs and therefore cannot be regarded as temporary. On the contrary,

there is a natural progression from Postdoc to ARS. The petitioned-for employees share a community of interest.

IV. CONCLUSION

The Regional Director should direct an election in the unit as amended.

THE PETITIONER

By



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APPENDIX A

Unique ID	First	Last	DEPARTMENT	CLASSIFICATION
9208	Yair	Antman	Ctr Integrated Science & Eng	Postdoc Research Scientist
9208	Yair	Antman	Ctr Integrated Science & Eng	Postdoctoral Research Fellow
903260	Nir	Barak	Department of Sociology	Postdoctoral Research Fellow
903260	Nir	Barak	Department of Sociology	Postdoctoral Research Scholar
2665	Danielle Rose	Bogdanowicz	Dept of Biomedical Engineering	Postdoc Research Scientist
2665	Danielle Rose	Bogdanowicz	Dept of Biomedical Engineering	Postdoctoral Research Fellow
5677	Bridget L.	Callaghan	Department of Psychology	Postdoc Research Scientist
5677	Bridget L.	Callaghan	Department of Psychology	Postdoctoral Research Fellow
8537	Yao Wen	Chang	Department of Chemistry	Postdoc Research Scientist
8537	Yao Wen	Chang	Department of Chemistry	Postdoctoral Research Fellow
7097	Anindita	Dasgupta	School of Social Work	Postdoc Research Scientist
7097	Anindita	Dasgupta	School of Social Work	Postdoctoral Research Fellow
6421	Jonathan	De Roo	Department of Chemistry	Postdoc Research Scientist
6421	Jonathan	De Roo	Department of Chemistry	Postdoctoral Research Fellow
4530	Laurent	Dercle	Department of Radiology	Postdoc Research Scientist
4530	Laurent	Dercle	Department of Radiology	Postdoctoral Research Fellow
4288	Micaela	dos Santos Cunha	Ctr for Radiological Research	Postdoc Research Scientist
4288	Micaela	dos Santos Cunha	Ctr for Radiological Research	Postdoctoral Research Fellow
8458	Ling	He	College of Dental Medicine	Postdoc Research Scientist
8458	Ling	He	College of Dental Medicine	Postdoctoral Research Fellow
5546	Pierre Michel	Hillenbrand	Columbia Astrophysics Lab	Postdoc Research Scientist
5546	Pierre Michel	Hillenbrand	Columbia Astrophysics Lab	Postdoctoral Research Fellow
903529	Xun	Hou	Zuckerman Institute	Postdoc Research Scientist
903529	Xun	Hou	Zuckerman Institute	Postdoctoral Research Fellow
8491	Rebecca	Kehm	Department of Epidemiology	Postdoc Research Scientist
8491	Rebecca	Kehm	Department of Epidemiology	Postdoctoral Research Fellow
5331	Hyesung	Kim	Dept of Biomedical Engineering	Postdoc Research Scientist
5331	Hyesung	Kim	Dept of Biomedical Engineering	Postdoctoral Research Fellow
5841	Alisa	Knizel	Department of Mathematics	Postdoc Research Scientist
5841	Alisa	Knizel	Department of Mathematics	Postdoctoral Research Fellow
8382	Brian	Lawrence	Department of Mathematics	Postdoc Research Scientist
8382	Brian	Lawrence	Department of Mathematics	Postdoctoral Research Fellow
8483	Oleg	Lazarev	Department of Mathematics	Postdoc Research Scientist
8483	Oleg	Lazarev	Department of Mathematics	Postdoctoral Research Fellow
8441	Jihoon	Lee	Dept of Chemical Engineering	Postdoc Research Scientist
8441	Jihoon	Lee	Dept of Chemical Engineering	Postdoctoral Research Fellow
5423	Scott W.	Linderman	Department of Statistics	Postdoc Research Scientist
5423	Scott W.	Linderman	Department of Statistics	Postdoctoral Research Fellow
6590	Daniel A	Litt	Department of Mathematics	Postdoc Research Scientist
6590	Daniel A	Litt	Department of Mathematics	Postdoctoral Research Fellow
4663	Xiangye	Liu	Dept of Chemical Engineering	Postdoc Research Scientist
4663	Xiangye	Liu	Dept of Chemical Engineering	Postdoctoral Research Fellow
902726	Tanguy Rene Vin	Lucas	Zuckerman Institute	Postdoc Research Scientist
902726	Tanguy Rene Vin	Lucas	Zuckerman Institute	Postdoctoral Research Fellow
6748	Claudia	Lugo-Candelas	Child & Adolescent Psychiatry	Postdoc Research Scientist
6748	Claudia	Lugo-Candelas	Child & Adolescent Psychiatry	Postdoctoral Research Fellow
9255	Sebastian F.	Maehrlein	Department of Chemistry	Postdoc Research Scientist

9255	Sebastian F.	Maehrlein	Department of Chemistry	Postdoctoral Research Fellow
6651	Dario	Martelli	Dept of Mechanical Engineering	Postdoc Research Scientist
6651	Dario	Martelli	Dept of Mechanical Engineering	Postdoctoral Research Fellow
6960	Keeley L.	Mui	Dept of Pathology&Cell Biology	Postdoc Research Scientist
6960	Keeley L.	Mui	Dept of Pathology&Cell Biology	Postdoctoral Research Fellow
7388	Junko	Mukohyama	Dept of Pathology&Cell Biology	Postdoc Research Scientist
7388	Junko	Mukohyama	Dept of Pathology&Cell Biology	Postdoctoral Research Fellow
5135	Anders M.	Nelson	Zuckerman Institute	Postdoc Research Scientist
5135	Anders M.	Nelson	Zuckerman Institute	Postdoctoral Research Fellow
8371	Azahara	Oliva Gonzalez	Zuckerman Institute	Postdoc Research Scientist
8371	Azahara	Oliva Gonzalez	Zuckerman Institute	Postdoctoral Research Fellow
8528	Wystan N.	Palmer	Department of Chemistry	Postdoc Research Scientist
8528	Wystan N.	Palmer	Department of Chemistry	Postdoctoral Research Fellow
6591	Alexander Richar Perry		Department of Mathematics	Postdoc Research Scientist
6591	Alexander Richar Perry		Department of Mathematics	Postdoctoral Research Fellow
902765	Sambuddha	Sanyal	Department of Chemistry	Postdoc Research Scientist
902765	Sambuddha	Sanyal	Department of Chemistry	Postdoctoral Research Fellow
8328	Shreya	Saxena	Department of Statistics	Postdoc Research Scientist
8328	Shreya	Saxena	Department of Statistics	Postdoctoral Research Fellow
5328	Dan	Shao	Dept of Biomedical Engineering	Postdoc Research Scientist
5328	Dan	Shao	Dept of Biomedical Engineering	Postdoctoral Research Fellow
9464	Zarrar	Shehzad	Zuckerman Institute	Postdoc Research Scientist
9464	Zarrar	Shehzad	Zuckerman Institute	Postdoctoral Research Fellow
8447	Kyler	Siegel	Department of Mathematics	Postdoc Research Scientist
8447	Kyler	Siegel	Department of Mathematics	Postdoctoral Research Fellow
5650	Zakary S.	Singer	Dept of Biomedical Engineering	Postdoc Research Scientist
5650	Zakary S.	Singer	Dept of Biomedical Engineering	Postdoctoral Research Fellow
8617	Kristi L.	Stringer	School of Social Work	Postdoc Research Scientist
8617	Kristi L.	Stringer	School of Social Work	Postdoctoral Research Fellow
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CERTIFICATE OF SERVICE

This is to certify that a copy of the foregoing Brief of the Petitioner to the Regional Director was sent via email, on this 4th day of September, 2018, to the following:

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