

**IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT, CHANCERY DIVISION**

NIKLAS HUNDER,)	
)	
Plaintiff,)	
)	2024CH05867
v.)	Calendar 14
)	
CHICAGO TRANSIT AUTHORITY,)	
)	
Defendant.)	

**RESPONSE TO DEFENDANT’S MOTION FOR EXTENSION
OF TIME TO ANSWER COMPLAINT**

I. INTRODUCTION AND SUMMARY

Defendant’s Motion for Extension of Time to Answer Complaint is not able to be complied with by Defendant given the extension date on its filing, no action by the Court by the end of the business day on Defendant’s Motion, and the current date as of the filing of this response. The Court cannot rule in favor of Defendant’s motion and have Defendant comply with the ruling given the date on the motion is in the past. Ruling in favor of the Defendant would only require Defendant to submit a new Motion to be granted. The Court should deny Defendant’s Motion for Extension of Time to Answer Complaint and approve Plaintiff’s Motion to Enter Default Judgement on All Counts Pursuant to Illinois Supreme Court Rule 181(a).

II. THE COURT SHOULD DENY DEFENDANT’S MOTION

A. Timeliness of Motion for Extension of Time to Answer Complaint

On January 29th, 2025, Defendant filed a Motion with the Court seeking an additional four business days to respond to Plaintiff’s Complaint which was served to Defendant on November

4th, 2024. This is after it has already been granted (by law and by additional order from the Court) 75 business days to file a response.

Defendant cannot comply with its proposed Motion because the Motion would have required Defendant to file its Answer to Plaintiff's Complaint with the Court by January 29th, 2025 which at the time of filing this response, has passed. Filing its Answer now would renew Plaintiff's calls for a ruling in favor of Plaintiff for his Motion to Enter Default Judgement on All Counts Pursuant to Illinois Supreme Court Rule 181(a). At any time, without needing an order or favorable ruling on a Motion, Defendant has been free to file its Response. Instead, Defendant continues to choose not to file an Answer after the deadline for filing in response to the Complaint has passed.

Plaintiff accepts that personal medical issues arise as reasons for not completing tasks based on personal experience but calls into question why Defendant waited until the week of January 20th, 2025 to begin formulating its proposed Answer to Plaintiff's Complaint when its deadline was January 23rd, 2025. Defendant had 41 previous calendar days to decide how it was going to plead and instead opted to do it at the last minute and regrettably was prevented from doing such. With its failure to explain why it was incapable of generating an Answer any sooner in its Motion, Defendant indicates to the Court that it was able to do as such but ultimately failed to do so. Defendant's failure to prepare cannot and should not be used against Plaintiff and be rewarded as meritorious by this court.

Beginning at a young age through higher education and sometimes in professional life, it is taught that an assignment/project/or other task with a deadline should not be completed at the last minute in case an unforeseen circumstance arises that prevents completion. Defendant's

actions regarding deadlines in this suit conveniently disregard this advice for the sake of its argument and again, expects the Court to be forgiving when it had 41 other calendar days to complete an Answer. This is more than ample time considering the cut-and-dry facts of the case and the small number of charges brought against Defendant.

At any point during the week of January 20th, 2025, the Defendant could have at a minimum, informally notified the Court that it would not be able to respond to the Complaint on time due to the illness of all three of its attorneys assigned to this case. Instead, Defendant has sought to ask for forgiveness after the deadline has passed rather than opting to be proactive.

In most professional jobs, it is expected that if you cannot show up to work, that notification of unavailability for the day is communicated with coworkers. It is rarely accepted practice not to provide notification of absence and leave others to figure out if an employee is showing up to work today—a parallel that is still active (Plaintiff has no indication if Defendant intends to file its Answer due to its continued lack of filing it past the ordered extension of the deadline). Another example is that federal grants have strict deadlines and provide notification in advance of final deadlines. Once that deadline has passed, there is no administrative remedy to allow an application to be considered. Deadlines are deadlines.

Plaintiff regrets that Defendant's attorneys suffered medical complications last week but given the ample time afforded to Defendant by law and without objection by Plaintiff, Defendant has once again failed to meet a deadline and uphold its end of the deal as required by 5 ILCS 140, Illinois Supreme Court Rule 181(a), and 735 ILCS 5/2-601.

B. Timeliness of Response to Plaintiff's FOIA Request (2024-0607)

In its claims for immunity from damages owed to Plaintiff, Defendant informs the court that it responded to Plaintiff's FOIA request on January 22nd, 2025, one day before its Answer was due. By indicating orally, on December 9th, 2024 at a hearing on the status of Service and where an additional 45 days to file an Answer was without objection allowed by Plaintiff, that Defendant was going to answer by this date, it indicated that it only intended to response because of suit and as expected, waited until the last minute to do such—taking a staggering 168 business days to respond. If Defendant was working in better faith to respond to Plaintiff's request, it would have done so much sooner considering the information provided response letter. A true and correct copy of the response letter is attached as Exhibit 3 with only one redaction of the Plaintiff's email address to protect his privacy.

In Exhibit 3, Defendant states "CTA is providing records or data available at the time of CTA's searches for records in connection with this request." True and correct copies of the responsive records as being introduced as Exhibits 4, 5, and 6. Exhibits 4 and 6 have been covered from .XLSX format to .PDF. As indicated by language in Exhibit 3, Exhibit 4 titled "Rail Ops Qualification Spreadsheet 2024 – Rail Ops" is up to date "through June 29, 2024," Exhibit 5, "Qual. Working Dc for J. Alexander 6.27.24" is a reformat of Exhibit 4, "updated as of June 27, 2024," and Exhibit 6, "Hunder CTA FOIA 6-3-24 Operator Headcount (2024 YTD Counts RTO CRO SW TW and EB)" does not provide information past June 2024.

Given that according to Exhibit 3, Defendant "is providing records or data available at the time of CTA's searches for records in connection with this request," the data has been in its FOIA officers' possession since late June but instead, Defendant only bothered to provide it not even when the suit was brought but until it was compelled to by their own interest to try and persuade the Court that it is acting in good faith and should not be assessed civil penalties since it

at some point, produced responsive records for Plaintiff. There is no acceptable reason that Defendant could have only produced responsive records after 168 business days. Defendant wants this Court to believe and hold as meritorious that this small volume of records required 136 business days of administrative review to ensure that proper redactions were made despite a significant majority of the data not being redacted. Defendant has “willfully and intentionally failed to comply with this Act, or otherwise acted in bad faith” 5 ILCS 140/11(j).

This response comes so overdue that it has rendered the response to Plaintiff as useless because the data is seven months old. The plaintiff would need to file another request to obtain more relevant data. How can data about the first six months of 2024 advise Plaintiff’s actions in August 2024 if his request for it is provided in January 2025? Given Defendant’s treatment of this request, Plaintiff may end up having to file another suit, and the process will continue to repeat, just to obtain records.

C. Judicial Economy

Defendant is not serious about “judicial economy” as it suggested in the second footnote of its Motion. If it was genuinely worried about such, it would not have implied that Plaintiff was improper or inconsiderate when filing his Motion “almost immediately thereafter” the deadline for Defendant to file its Answer. What did it expect Plaintiff to do? Allow it to continue disregarding deadlines? That is why this suit exists—a failure to respond to legal deadlines. If anything, Plaintiff’s near immediate response was the best he could have committed to moving the proceedings along rather than waiting for the Defendant to file its Answer; or not. Given the response time to the request, it may have been several weeks before it actually filed an Answer. By the inclusion of Defendant’s Exhibit A to its motion, it shows that it was prompted to prepare it in response to Plaintiff’s Motion to Enter Default Judgement and had not yet completed a

version of its Answer. Without the Motion to Enter Default Judgement, Defendant may not have responded with a proposed Answer.

Additionally, it would be in the interest of the “judicial economy” to move directly to default judgment considering the repeated noncompliance by Defendant whether it is civil procedure or FOIA deadlines. Defendant’s second footnote affronts to casual intimidation to the Plaintiff that threatens to waste more time of his and the Judiciary’s time by making factually incorrect and unsupported Motions if he continues to pursue this case. Upon more careful review of the actions of its FOIA compliance employees, Defendant will realize that it cannot succeed after bringing a Motion to Vacate.

III. CONCLUSION

The court should deny the motion and not issue any judgment nor give thought to the proposed Answer until it is properly filed by Defendant and allow Plaintiff to file a Response to the Answer as he cannot appropriately respond to proposed pleadings.

Dated: February 2, 2025

RESPECTFULLY SUBMITTED,

/s/ Niklas Hunder

Niklas Hunder
Policy Analyst/Researcher

Exhibit 3



January 22, 2025

Via Electronic Mail

Nik Hunder



Re: Freedom of Information Act Request – FOIA 2024-0607

Dear Mr. Hunder,

This letter responds to your Freedom of Information Act (“FOIA”) request to the Chicago Transit Authority (“CTA”) that seeks the following:

Search for recordings showing:

- When a Rail Operator or Rail Manager training class took place or is scheduled to take place in 2024.
- How many employees were enrolled in each unique class, how many passed the class, and what positions those who passed were hired into (RTO, CSO, CRO, extra board, tower workers, signal operations, etc.) broken down by month. Records matching the previous definition but not showing the monthly breakdown should still be provided.
- Headcount of all rail operations staff per month broken down by Rapid Transit Operator, Combined Rail Operator, Combined Service Operator, Switch Worker, Tower Worker, and Extra Board.
- How many of each position were either terminated or resigned for each month and how many employees were hired into any of those positions by month. Records should show the reason for terminating an employee (not just any reason an employee could be terminated). Records matching the previous definition but not providing a monthly breakdown should still be provided.

For the first part, one type of matching record would be titled "rapid transit operator initial training class" followed by the class number.

For items two to four, CTA has this type of record in its HR records as demonstrated in its response to 2024-0193.

For Items three and four, CTA provided similar data in its response to 2023-1139. The time frame for responsive records can extend from 1/1/2024 to 10 days before the fulfillment of this request.

In response to your request, CTA performed a reasonable search and is providing you with the following:

In response to the first aspect of your request, CTA is providing you with a list of the RTO training classes held or scheduled to be held in 2024. The list below also provides the dates for said classes as well as the number of available slots for each class.

RTO #01-24	01/2024	03/2024	20
RTO #02-24	01/2024	04/2024	20
RTO #03-24	02/2024	05/2024	24
RTO #04-24	03/2024	06/2024	24
RTO #05-24	04/2024	07/2024	24
RTO #06-24	05/2024	08/2024	20
RTO #07-24	06/2024	09/2024	24
RTO #08-24	07/2024	10/2024	24
RTO #09-24	08/2024	11/2024	20
RTO #10-24	09/2024	12/2024	20

In response to the second aspect of your request, CTA is providing you with two sets of data, to the extent that they contain responsive data. The Excel spreadsheet entitled “Rail Ops Qualification Spreadsheet 2024 – Rail Ops” is from our Training and Instruction Department, that shows the outcome of RTO Training classes in 2024 through June 29, 2024. The .pdf file entitled “Qual. Working Dc for J. Alexander 6.27.24” contains “Current Status” information regarding the individuals attending the RTO training. This document is updated as of June 27, 2024. In addition, extraneous information that is not responsive to your FOIA request, as stated, has been removed from these records.

In response to the third and fourth aspects of your request, CTA publishes combined headcounts for the positions named in your request that are available through CTA’s website at <https://www.transitchicago.com/performance/>. CTA is also providing you with an Excel workbook with multiple tabs. The first tab provides a monthly headcount for each position you requested from January to June 2024. Please note, however, that CTA does not have a “Combined Service Operator” position. The second tab provides the terminations per month in 2024 for the positions that you requested, with termination reasons. The third tab provides new hires/transitions into data for each position that you requested in each month in 2024. The fourth tab provides data on transitions out of the requested positions per month in 2024.

Please note that there are some differences in the headcounts between the dataset being provided in this response and the CTA scorecards. These differences are due to the timing of the entry of the transaction into the Human Resources data system. For example, the termination of an employee may not be entered into the HR data system until after the beginning of following month. Thus, HR data for a given month viewed on two different dates in the following month may contain slightly different data based upon when a transaction was entered.

Finally, to the extent that your request described the time scope of your request to be seeking records “from 1/1/2024 to 10 days before the fulfillment of this request”, your request is nebulous and “deprived CTA of an objective means of determining” the records responsive to your request “at the time it was received.” FOIA Request for Review – 2024 PAC 80290. FOIA does not “require CTA to try to hit a moving target.” Id. Therefore, CTA is providing records or data available at the time of CTA’s searches for records in connection with this request.

You have a right to have the redactions to the records reviewed by the Public Access Counselor (PAC) at the Office of the Illinois Attorney General. 5 ILCS 140/9.5(b). You can file your Request for Review with the PAC by writing to:

Public Access Counselor
Office of the Attorney General
500 South 2nd Street
Springfield, Illinois 62706
Fax: 217-782-1396
E-mail: public.access@ilag.gov

If you choose to file a Request for Review with the PAC, you must do so within 60 calendar days of the date of this denial letter. 5 ILCS 140/9.5(a). Please note that you must include a copy of your original FOIA request and this partial denial letter when filing a Request for Review with the PAC.

You also have the right to seek judicial review of the partial denial of your request by filing a lawsuit in the Circuit Court of Cook County, Illinois. 5 ILCS 140/11.

Please contact me if you have any questions regarding your FOIA request to CTA.

Sincerely,

Brigett R. Bevan
Managing Attorney
Compliance, Policy and Risk

Exhibit 4

RTO Training Status Report			
Year: 2024			
#	Training Program #	Qualification Date	Notes
1	RTO #01-2024	03/14/24	
2	RTO #01-2024	03/14/24	
3	RTO #01-2024	03/21/24	
4	RTO #01-2024	03/14/24	
5	RTO #01-2024	04/08/24	
6	RTO #01-2024	04/09/24	
7	RTO #01-2024	04/10/24	
8	RTO #01-2024	03/27/24	
9	RTO #01-2024	N/A	Returned to Terminal 02/27/24. NOT RESPONSIVE
10	RTO #01-2024	03/29/24	
11	RTO #01-2024	03/27/24	
12	RTO #01-2024	N/A	Returned to Terminal - EE Resigned from CTA 02/16/24
13	RTO #01-2024	04/10/24	
14	RTO #01-2024	03/27/24	
15	RTO #01-2024	N/A	Removed from Training - NOT RESPONSIVE
16	RTO #01-2024	04/02/24	
17	RTO #01-2024	03/14/24	
18	RTO #01-2024	03/14/24	
19	RTO #01-2024	03/19/24	
20	RTO #01-2024	03/19/24	
1	RTO #02-2024	04/11/24	
2	RTO #02-2024	04/23/24	
3	RTO #02-2024	04/15/24	
4	RTO #02-2024	N/A	NOT RESPONSIVE
5	RTO #02-2024	05/06/24	
6	RTO #02-2024	04/24/24	
7	RTO #02-2024	05/17/24	
8	RTO #02-2024	05/06/24	
9	RTO #02-2024	04/15/24	
10	RTO #02-2024	05/14/24	
11	RTO #02-2024	05/10/24	
12	RTO #02-2024	05/01/24	
13	RTO #02-2024	04/11/24	
14	RTO #02-2024	05/06/24	
15	RTO #02-2024	05/03/24	
16	RTO #02-2024	04/25/24	
17	RTO #02-2024	05/01/24	
18	RTO #02-2024	04/18/24	
19	RTO #02-2024	04/23/24	
20	RTO #02-2024	05/17/24	
1	RTO #03-2024	05/08/24	
2	RTO #03-2024	05/09/24	
3	RTO #03-2024	05/13/24	

4	RTO #03-2024	05/08/24	
5	RTO #03-2024	05/31/24	
6	RTO #03-2024	N/A	Returned to Route 02/28/24. Discharged from CTA
7	RTO #03-2024	N/A	NOT RESPONSIVE
8	RTO #03-2024	05/31/24	
9	RTO #03-2024	05/09/24	
10	RTO #03-2024	05/16/24	
11	RTO #03-2024	05/16/24	
12	RTO #03-2024	05/10/24	
13	RTO #03-2024	05/28/24	
14	RTO #03-2024	06/04/24	
15	RTO #03-2024	06/19/24	
16	RTO #03-2024	05/28/24	
17	RTO #03-2024	05/09/24	
18	RTO #03-2024	05/09/24	
19	RTO #03-2024	N/A	05/18/2024- IOD
20	RTO #03-2024	N/A	Returned to Route 04/12/24 Resigned accepted a different position.
21	RTO #03-2024	05/20/24	
22	RTO #03-2024	05/13/24	
23	RTO #03-2024	05/21/24	
24	RTO #03-2024	05/09/24	
1	RTO #04-2024	In Training	
2	RTO #04-2024	06/21/24	
3	RTO #04-2024	06/07/24	
4	RTO #04-2024	06/10/24	
5	RTO #04-2024	06/24/24	
6	RTO #04-2024	06/24/24	
7	RTO #04-2024	In Training	
8	RTO #04-2024	06/28/24	
9	RTO #04-2024	06/27/24	
10	RTO #04-2024	N/A	5/20/2024-EE Resigned from the Authority
11	RTO #04-2024	06/29/24	
12	RTO #04-2024	06/20/24	
13	RTO #04-2024	06/20/24	
14	RTO #04-2024	06/12/24	
15	RTO #04-2024	06/07/24	
16	RTO #04-2024	06/07/24	
17	RTO #04-2024	06/24/24	
18	RTO #04-2024	06/07/24	
19	RTO #04-2024	06/27/24	
20	RTO #04-2024	06/21/24	
21	RTO #04-2024	In Training	
22	RTO #04-2024	N/A	NOT RESPONSIVE
23	RTO #04-2024	06/08/24	
24	RTO #04-2024	N/A	06/27/2024. EE Resigned from Authority

1	RTO #05-2024	In Training	
2	RTO #05-2024	In Training	
3	RTO #05-2024	In Training	
4	RTO #05-2024	In Training	
5	RTO #05-2024	In Training	
6	RTO #05-2024	In Training	
7	RTO #05-2024	In Training	
8	RTO #05-2024	In Training	
9	RTO #05-2024	In Training	
10	RTO #05-2024	In Training	
11	RTO #05-2024	In Training	
12	RTO #05-2024	In Training	
13	RTO #05-2024	In Training	
14	RTO #05-2024	In Training	
15	RTO #05-2024	In Training	
16	RTO #05-2024	In Training	
17	RTO #05-2024	In Training	
18	RTO #05-2024	In Training	
19	RTO #05-2024	In Training	
20	RTO #05-2024	In Training	
21	RTO #05-2024	In Training	
22	RTO #05-2024	In Training	
23	RTO #05-2024	N/A	06/06/2024, EE resigned from the Authority.
24	RTO #05-2024	In Training	
1	RTO #06-2024	In Training	Manager in training
2	RTO #06-2024	In Training	
3	RTO #06-2024	In Training	
4	RTO #06-2024	N/A	NOT RESPONSIVE
5	RTO #06-2024	In Training	
6	RTO #06-2024	In Training	
7	RTO #06-2024	In Training	
8	RTO #06-2024	In Training	
9	RTO #06-2024	N/A	NOT RESPONSIVE
10	RTO #06-2024	In Training	
11	RTO #06-2024	In Training	
12	RTO #06-2024	In Training	
13	RTO #06-2024	In Training	
14	RTO #06-2024	In Training	
15	RTO #06-2024	In Training	
16	RTO #06-2024	In Training	
17	RTO #06-2024	In Training	
18	RTO #06-2024	In Training	
19	RTO #06-2024	In Training	
20	RTO #06-2024	In Training	
1	RTO #07-2024	In Training	
2	RTO #07-2024	In Training	

3	RTO #07-2024	In Training	
4	RTO #07-2024	In Training	
5	RTO #07-2024	In Training	
6	RTO #07-2024	In Training	
7	RTO #07-2024	In Training	
8	RTO #07-2024	In Training	
9	RTO #07-2024	In Training	
10	RTO #07-2024	In Training	
11	RTO #07-2024	In Training	
12	RTO #07-2024	In Training	
13	RTO #07-2024	In Training	
14	RTO #07-2024	In Training	
15	RTO #07-2024	In Training	
16	RTO #07-2024	In Training	
17	RTO #07-2024	In Training	
18	RTO #07-2024	In Training	
19	RTO #07-2024	In Training	
20	RTO #07-2024	In Training	
21	RTO #07-2024	In Training	
22	RTO #07-2024	In Training	
23	RTO #07-2024	In Training	
24	RTO #07-2024	In Training	

Exhibit 5

Updated 6/27/2024

Working Document for ongoing updating

RTO Training Status Report			
Year: 2024			
#	Training Program #	Qualification Date	Current Status (Please start with date, followed by status)
1	RTO #01-2024	03/14/24	Transitioned to CRO 4/7/2024
2	RTO #01-2024	03/14/24	Transitioned to CRO 4/7/2024
3	RTO #01-2024	03/21/24	Transitioned to CRO 4/7/2024
4	RTO #01-2024	03/14/24	Unable to Transition: Not Responsive
5	RTO #01-2024	04/08/24	Transitioned to CRO 4/28/2024
6	RTO #01-2024	04/09/24	Unable to Transition: Not Responsive
7	RTO #01-2024	04/10/24	Transitioned to CRO 4/28/2024
8	RTO #01-2024	03/27/24	Transitioned to CRO 4/7/2024
9	RTO #01-2024		Returned to Terminal - Not Responsive
10	RTO #01-2024	03/29/24	Transitioned to CRO 4/28/2024
11	RTO #01-2024	03/27/24	Transitioned to CRO 4/7/2024
12	RTO #01-2024		Returned to Terminal - EE Resigned 2/16/2024
13	RTO #01-2024	04/10/24	Transitioned to CRO 4/28/2024
14	RTO #01-2024	03/27/24	Unable to Transition: Not Responsive
15	RTO #01-2024		Removed from Training - Not Responsive
16	RTO #01-2024	04/02/24	Declined CRO Transition Promotion
17	RTO #01-2024	03/14/24	Transitioned to CRO 4/7/2024
18	RTO #01-2024	03/14/24	Unable to Transition: Not Responsive
19	RTO #01-2024	03/19/24	Transitioned to CRO 4/7/2024
20	RTO #01-2024	03/19/24	Transitioned to CRO 4/7/2024
1	RTO #02-2024	04/11/24	Transitioned to CRO 4/28/2024
2	RTO #02-2024	04/23/24	Transitioned to CRO 5/26/2024
3	RTO #02-2024	04/15/24	Transitioned to CRO 4/28/2024
4	RTO #02-2024		Removed from Training; Discharged
5	RTO #02-2024	05/06/24	Transitioned to CRO 5/26/2024
6	RTO #02-2024	04/24/24	Transitioned to CRO 5/26/2024
7	RTO #02-2024	05/17/24	Transitioned to CRO on 6/9/2024
8	RTO #02-2024	05/06/24	Transitioned to CRO 5/26/2024
9	RTO #02-2024	04/15/24	Transitioned to CRO 4/28/2024
10	RTO #02-2024	05/14/24	Transitioned to CRO on 6/9/2024
11	RTO #02-2024	05/10/24	Transitioned to CRO 5/26/2024
12	RTO #02-2024	05/01/24	Transitioned to CRO 5/26/2024
13	RTO #02-2024	04/11/24	Transitioned to CRO 4/28/2024
14	RTO #02-2024	05/06/24	Transitioned to CRO 5/26/2024
15	RTO #02-2024	05/03/24	Transitioned to CRO 5/26/2024
16	RTO #02-2024	04/25/24	Transitioned to CRO 5/26/2024
17	RTO #02-2024	05/01/24	Transitioned to CRO 5/26/2024
18	RTO #02-2024	04/18/24	Transitioned to CRO 5/26/2024
19	RTO #02-2024	04/23/24	Transitioned to CRO 5/26/2024
20	RTO #02-2024	05/17/24	Transitioned to CRO on 6/9/2024
1	RTO #03-2024	05/08/24	Transitioned to CRO 5/26/2024
2	RTO #03-2024	05/09/24	Transitioned to CRO 5/26/2024
3	RTO #03-2024	05/13/24	Transitioned to CRO on 6/9/2024
4	RTO #03-2024	05/08/24	Transitioned to CRO 5/26/2024
5	RTO #03-2024	05/31/24	Transitioned to CRO on 6/23/2024
6	RTO #03-2024		Returned to Route 02/28/24 Discharged from CTA
7	RTO #03-2024		Removed from Training: Not Responsive
8	RTO #03-2024	05/31/24	Transitioned to CRO on 6/23/2024
9	RTO #03-2024	05/09/24	Transitioned to CRO 5/26/2024
10	RTO #03-2024	05/16/24	Transitioned to CRO on 6/9/2024
11	RTO #03-2024	05/16/24	Transitioned to CRO on 6/9/2024
12	RTO #03-2024	05/10/24	Transitioned to CRO 5/26/2024
13	RTO #03-2024	05/28/24	Transitioned to CRO on 6/9/2024
14	RTO #03-2024	06/04/24	Transitioned to CRO on 6/23/2024
15	RTO #03-2024	06/19/24	Pending Transition Meeting w/ HR July 2, 2024
16	RTO #03-2024	05/28/24	Transitioned to CRO on 6/9/2024
17	RTO #03-2024	05/09/24	Transitioned to CRO 5/26/2024
18	RTO #03-2024	05/09/24	Transitioned to CRO 5/26/2024
19	RTO #03-2024		IOD: Returned to Route on 5.16.2024 Not Responsive
20	RTO #03-2024		Returned to Route 04/12/24 Resigned accepted a different position.
21	RTO #03-2024	05/20/24	Transitioned to CRO on 6/9/2024
22	RTO #03-2024	05/13/24	Transitioned to CRO on 6/9/2024
23	RTO #03-2024	05/21/24	Transitioned to CRO on 6/9/2024
24	RTO #03-2024	05/09/24	Transitioned to CRO 5/26/2024
1	RTO #04-2024		In RTO Training
2	RTO #04-2024	06/21/24	Pending Transition Meeting w/ HR July 2, 2024
3	RTO #04-2024	6/7/2024	Transitioned to CRO on 6/23/2024

Not Responsive

4	RTO #04-2024	6/10/2024	Transitioned to CRO on 6/23/2024
5	RTO #04-2024	06/24/24	Pending Transition Meeting w/ HR July 2, 2024
6	RTO #04-2024	06/24/24	Pending Transition Meeting w/ HR July 2, 2024
7	RTO #04-2024		In RTO Training
8	RTO #04-2024		In RTO Training
9	RTO #04-2024		In RTO Training
10	RTO #04-2024		Resigned in Training; Personal Reasons on 5/20/2024
11	RTO #04-2024		In RTO Training
12	RTO #04-2024	06/20/24	Pending Transition Meeting w/ HR July 2, 2024
13	RTO #04-2024	06/20/24	Pending Transition Meeting w/ HR July 2, 2024
14	RTO #04-2024	06/12/24	Transitioned to CRO on 6/23/2024
15	RTO #04-2024	06/07/24	Transitioned to CRO on 6/23/2024
16	RTO #04-2024	06/07/24	Transitioned to CRO on 6/23/2024
17	RTO #04-2024	06/24/24	Pending Transition Meeting w/ HR July 2, 2024
18	RTO #04-2024	06/07/24	Transitioned to CRO on 6/23/2024
19	RTO #04-2024		In RTO Training
20	RTO #04-2024	06/21/24	Pending Transition Meeting w/ HR July 2, 2024
21	RTO #04-2024		In RTO Training
22	RTO #04-2024		Not Responsive
23	RTO #04-2024	06/08/24	Transitioned to CRO on 6/23/2024
24	RTO #04-2024		Resigned in Training; Personal Reasons on 6/27/2024
1	RTO #05-2024		In RTO Training
2	RTO #05-2024		In RTO Training
3	RTO #05-2024		In RTO Training
4	RTO #05-2024		In RTO Training
5	RTO #05-2024		In RTO Training
6	RTO #05-2024		In RTO Training
7	RTO #05-2024		In RTO Training
8	RTO #05-2024		In RTO Training
9	RTO #05-2024		In RTO Training
10	RTO #05-2024		In RTO Training
11	RTO #05-2024		In RTO Training
12	RTO #05-2024		In RTO Training
13	RTO #05-2024		In RTO Training
14	RTO #05-2024		In RTO Training
15	RTO #05-2024		In RTO Training
16	RTO #05-2024		In RTO Training
17	RTO #05-2024		In RTO Training
18	RTO #05-2024		In RTO Training
19	RTO #05-2024		In RTO Training
20	RTO #05-2024		In RTO Training
21	RTO #05-2024		In RTO Training
22	RTO #05-2024		In RTO Training
23	RTO #05-2024		6/1/2024 Resigned
24	RTO #05-2024		In RTO Training
1	RTO #06-2024		In RTO Training; Rail Operations Transportation Manager I
2	RTO #06-2024		In RTO Training
3	RTO #06-2024		In RTO Training
4	RTO #06-2024		In RTO Training; Not Responsive
5	RTO #06-2024		In RTO Training
6	RTO #06-2024		In RTO Training
7	RTO #06-2024		In RTO Training
8	RTO #06-2024		In RTO Training
9	RTO #06-2024		In RTO Training; Not Responsive
10	RTO #06-2024		In RTO Training
11	RTO #06-2024		In RTO Training
12	RTO #06-2024		In RTO Training
13	RTO #06-2024		In RTO Training
14	RTO #06-2024		In RTO Training
15	RTO #06-2024		In RTO Training
16	RTO #06-2024		In RTO Training
17	RTO #06-2024		In RTO Training
18	RTO #06-2024		In RTO Training
19	RTO #06-2024		In RTO Training
20	RTO #06-2024		In RTO Training
1	RTO #07-2024		In RTO Training
2	RTO #07-2024		In RTO Training
3	RTO #07-2024		In RTO Training
4	RTO #07-2024		In RTO Training
5	RTO #07-2024		In RTO Training
6	RTO #07-2024		In RTO Training
7	RTO #07-2024		In RTO Training
8	RTO #07-2024		In RTO Training

Not Responsive

9		RTO #07-2024		In RTO Training
10		RTO #07-2024		In RTO Training
11		RTO #07-2024		In RTO Training
12		RTO #07-2024		In RTO Training
13		RTO #07-2024		In RTO Training
14		RTO #07-2024		In RTO Training
15		RTO #07-2024		In RTO Training
16		RTO #07-2024		In RTO Training
17		RTO #07-2024		In RTO Training
18		RTO #07-2024		In RTO Training
19		RTO #07-2024		In RTO Training
20		RTO #07-2024		In RTO Training
21		RTO #07-2024		In RTO Training
22		RTO #07-2024		In RTO Training
23		RTO #07-2024		In RTO Training
24		RTO #07-2024		In RTO Training

Exhibit 6

MONTH	Combined Rail Operator	Extra Board	Rapid Transit Operator	Switch Worker	Tower Worker	Grand Total
JAN	31	145	299	207	53	735
FEB	32	150	283	207	52	724
MAR	33	149	282	207	52	723
APR	16	118	333	216	53	736
MAY	36	115	328	214	52	745
JUN	47	117	326	214	52	756

MONTH	EMP_STATUS	Extra Board	Rapid Transit Operator	Switch Worker	Grand Total
Jan	Death		1		1
	Discharged	1	2		3
	Resigned		1		1
	Retired	1			1
Jan Total		2	4		6
Feb	Discharged		3		3
Feb Total			3		3
Mar	Discharged	1			1
	Resigned		1		1
Mar Total		1	1		2
Apr	Discharged	1	2		3
	Resigned		1		1
	Retired			1	1
Apr Total		1	3	1	5
May	Discharged		1		1
	Resigned		1		1
	Retired		1		1
May Total			3		3
Grand Total		4	14	1	19

MONTH	PREV_POSITION	Combined Rail Operator	Extra Board	Rapid Transit Operator	Switch Worker	Grand Total
Jan	Temporary Medical Disability			1		1
Jan Total				1		1
Feb	Flagger	1				1
	Temporary Medical Disability		2		1	3
Feb Total		1	2		1	4
Mar	Flagger	1				1
	Rail Clerk III			1		1
	Temporary Medical Disability		1			1
Mar Total		1	1	1		3
Apr	Flagger	16				16
	Temporary Medical Disability		2			2
Apr Total		16	2			18
May	Flagger	20				20
	Temporary Medical Disability		1	1		2
May Total		20	1	1		22
Jun	Flagger	11				11
	Temporary Medical Disability		2			2
Jun Total		11	2			13
Grand Total		49	8	3	1	61

MONTH	NEW_POSITION	Extra Board	Rapid Transit Operator	Switch Worker	Tower Worker	Grand Total
Jan	Rail Controller		1			1
	Temporary Medical Disability		2	1		3
Jan Total			3	1		4
Feb	Chief Clerk (Rail)		1			1
	Rail Clerk II		3			3
	Rail Clerk III		2			2
	Temporary Medical Disability	1	3			4
Feb Total		1	9			10
Mar	Manager, Transportation - Rail		1			1
	Temporary Medical Disability	1				1
Mar Total		1	1			2
Apr	Temporary Medical Disability			1		1
Apr Total				1		1
May	Rail Instructor I	3	2	1	1	7
	Temporary Medical Disability	1	3			4
May Total		4	5	1	1	11
Grand Total		6	18	3	1	28