UNITED STATES OF AMERICA
BEFORE THE NATIONAL LABOR RELATIONS BOARD
REGION 11

SAVANNAH RIVER NUCLEAR SOLUTIONS, LLC,	)	
	)	**Case: 11-CA-22903**
and	)	
VERNON GULLEGE, An individual,	)	

CHARGING PARTY'S OPPOSITION TO
RESPONDENT'S MOTION FOR SUMMARY JUDGMENT

Charging Party Vernon Lee Gulledge submits this opposition to Respondent's Motion for Summary Judgment filed on April 8, 2011.

Respondent filed its Motion for Summary Judgment in this contested matter, ignoring the factual disputes created by the Complaint allegations and Answer denials. Charging Party joins the Acting General Counsel in opposing Respondent's motion. Charging Party disputes the facts asserted by Respondent in its motion. Charging Party submits that he and the other claimants named in the Complaint were discharged because of their protected, concerted activity. Charging Party further denies that Charles Weigel was a supervisor within the meaning of the Act.

Charging Party adds to the case law cited by the Acting General Counsel in his opposition the Board's decision in *KIRO, Inc.*, 311 NLRB 745 (1993). The Board makes it clear in this decision that summary judgment is inappropriate where respondent denies the allegations as set forth in the complaint.

Accordingly, Charging Party urges the Board to summarily deny Respondent's Motion for Summary Judgment.

Respectfully submitted,

BROOKS LAW FIRM, LLC

s/ Lovic A. Brooks, III

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ATTORNEY FOR CHARGING PARTY

Columbia, South Carolina
April 18, 2011

IN THE UNITED STATES
BEFORE THE NATIONAL LABOR RELATIONS BOARD
REGION 11

SAVANNAH RIVER NUCLEAR SOLUTIONS, LLC,	)	**Case: 11-CA-22903**
	)	**CERTIFICATE OF SERVICE**
VERNON GULLEGE, An individual,	)	

It is hereby certified that Charging Party's Opposition to Respondent's Motion for Summary Judgment in the above-captioned matter has been served by electronically mailing copies of the same to:

Jasper Brown, Esquire
National Labor Relations Board
Counsel for Acting General Counsel
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and

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