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UNITED STATES OF AMERICA

NATIONAL LABOR RELATIONS BOARD

REGION 28

Caesars Entertainment Corporation d/b/a Rio All-Suites Hotel and Casino. Employer, and International Union of Painters and Allied Trades, District Council 15, Local 159 Union.	Case No. 28-RC-6747 **RESPONSE TO EXCEPTIONS**

The Exceptions in this case are frivolous. The Employer hasn't even attached a copy of the Hearing Officer's report as required by the Board's rules.

With respect to the handbook an employee did authenticate it as conceded by the exceptions. The employer was in a position to prove that that wasn't the current handbook and failed to do so.

The rules which the Hearing Officer found invalid are plainly invalid.

The employer is attempting to re-litigate the credibility findings regarding the promised benefit increases and wage increases from Dean Allen.

These exceptions are filed for delay and the Board should immediately reject them so that the workers can have a chance to vote for a Union.

Dated: April 26 2011

WEINBERG, ROGER & ROSENFELD
A Professional Corporation

By: /s/David A. Rosenfeld
David A. Rosenfeld
Attorneys for the Union

126881/618553

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PROOF OF SERVICE
(CCP 1013)

I am a citizen of the United States and an employee in the County of Alameda, State of California. I am over the age of eighteen years and not a party to the within action; my business address is 1001 Marina Village Parkway, Suite 200, Alameda, California 94501-1091. On April 26, 2011, I served upon the following parties in this action:

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copies of the document(s) described as:

RESPONSE TO EXCEPTIONS

[X] BY ELECTRONIC FILING

[X] BY EMAIL

[] BY MAIL I placed a true copy of each document listed herein in a sealed envelope, addressed as indicated herein, and caused each such envelope, with postage thereon fully prepaid, to be placed in the United States mail at Alameda, California. I am readily familiar with the practice of Weinberg, Roger & Rosenfeld for collection and processing of correspondence for mailing, said practice being that in the ordinary course of business, mail is deposited in the United States Postal Service the same day as it is placed for collection.

[ ] BY OVERNIGHT DELIVERY SERVICE I placed a true copy of each document listed herein in a sealed envelope, addressed as indicated herein, and placed the same for collection by Overnight Delivery Service by following the ordinary business practices of Weinberg, Roger & Rosenfeld, Alameda, California. I am readily familiar with the practice of Weinberg, Roger & Rosenfeld for collection and processing of Overnight Delivery Service correspondence, said practice being that in the ordinary course of business, Overnight Delivery Service correspondence is deposited at the Overnight Delivery Service offices for next day delivery the same day as Overnight Delivery Service correspondence is placed for collection.

I certify under penalty of perjury that the above is true and correct. Executed at Alameda, California, on April 26, 2011.

/s/Katrina Shaw
Katrina Shaw

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