

1 CAREN P. SENCER, Bar No. 233488
2 WEINBERG, ROGER & ROSENFELD
3 A Professional Corporation
4 1001 Marina Village Parkway, Suite 200
5 Alameda, California 94501
6 Telephone (510) 337-1001
7 Fax (510) 337-1023
8 E-Mail: csencer@unioncounsel.net

9 Attorneys for Union
10 INTERNATIONAL ASSOCIATION OF MACHINISTS AND
11 AEROSPACE WORKERS, AFL-CIO, DISTRICT LODGE 190

12 UNITED STATES OF AMERICA
13 BEFORE THE NATIONAL LABOR RELATIONS BOARD
14 WASHINGTON, D.C.

15 EUROPA AUTO IMPORTS, INC. d/b/a
16 MERCEDES-BENZ OF SAN DIEGO,

17 Employer,

18 and

19 INTERNATIONAL ASSOCIATION OF
20 MACHINISTS AND AEROSPACE
21 WORKERS, AFL-CIO, DISTRICT
22 LODGE 190,

23 Union.

No. 21-CA-063725

**INTERNATIONAL ASSOCIATION OF
MACHINISTS AND AEROSPACE
WORKERS, AFL-CIO, DISTRICT
LODGE 190'S JOINDER**

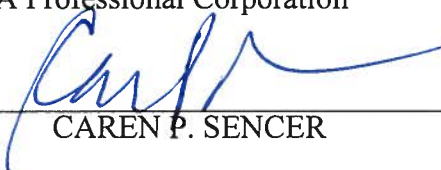
24 The International Association of Machinists and Aerospace Workers, AFL-CIO, District
25 Lodge 190 hereby joins in the Counsel for the Acting General Counsel's Motion for Summary
26 Judgment against Europa Auto Imports, Inc. d/b/a Mercedes-Benz of San Diego.

27 In addition to the remedies sought by the Board, the Charging Party also requests
28 additional remedies including requiring the Employer to read the Notice to Employees delineating
the unfair labor practices found and to video such reading for mandatory posting on the company
website. These remedies are justified, as this Employer is a regular violator of the National Labor
Relations Act as shown by the settlement in Cases 21-CA-39622, 21-CA-39653 and 21-CA-
39777. As part of the settlement of those cases, the Employer was required to read the posted

1 notice to an assembled mass of all the bargaining unit employees. The remedies in this case
2 should require at least the same.

3 Dated: October 6, 2011

WEINBERG, ROGER & ROSENFELD
A Professional Corporation



By: _____
CAREN P. SENCER

Attorneys for Union
INTERNATIONAL ASSOCIATION OF
MACHINISTS AND AEROSPACE WORKERS,
AFL-CIO, DISTRICT LODGE 190

128820/639527

4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

