



Representing Management Exclusively in Workplace Law and Related Litigation

Jackson Lewis LLP
2800 Quarry Lake Drive
Suite 200
Baltimore, Maryland 21209
Tel 410 415-2000
Fax 410 415-2001
www.jacksonlewis.com

- ALBANY, NY
ALBUQUERQUE, NM
ATLANTA, GA
BALTIMORE, MD
BIRMINGHAM, AL
BOSTON, MA
CHICAGO, IL
CINCINNATI, OH
CLEVELAND, OH
DALLAS, TX
DENVER, CO
DETROIT, MI
GREENVILLE, SC
HARTFORD, CT
HOUSTON, TX
INDIANAPOLIS, IN
JACKSONVILLE, FL
LAS VEGAS, NV
LONG ISLAND, NY
LOS ANGELES, CA
MEMPHIS, TN
MIAMI, FL
MILWAUKEE, WI
MINNEAPOLIS, MN
MORRISTOWN, NJ
NEW ORLEANS, LA
NEW YORK, NY
NORFOLK, VA
OMAHA, NE
ORANGE COUNTY, CA
ORLANDO, FL
PHILADELPHIA, PA
PHOENIX, AZ
PITTSBURGH, PA
PORTLAND, OR
PORTSMOUTH, NH
PROVIDENCE, RI
RALEIGH-DURHAM, NC
RICHMOND, VA
SACRAMENTO, CA
SAN DIEGO, CA
SAN FRANCISCO, CA
SEATTLE, WA
STAMFORD, CT
WASHINGTON, DC REGION
WHITE PLAINS, NY

DIRECT DIAL: 410-415-2006
EMAIL ADDRESS: STEPHEN.SILVESTRI@JACKSONLEWIS.COM

January 24, 2012

VIA ELECTRONIC MAIL

Lester Heltzer
Executive Secretary
National Labor Relations Board
1099 14th Street, N. W.
Washington, D. C. 20570

RE: Errata Sheet for Vertis, Inc.'s Answering Brief
Case No.: 22-RC-061844

Dear Mr. Heltzer:

On behalf of Vertis, Inc., we submit this Errata Sheet for its Answering Brief in Opposition to Union's Exceptions to Administrative Law Judge's Decision on Challenged Ballots and Objections. We have served a copy of this filing to both Counsel for the Union and the Regional Director.

Page 14, Lines 4-5:

Original: "The Union criticizes Judge Green's decision because it failed to account for the fact that Diaz did not testify. (Union's Brief ____)."

Correction: This sentence should be struck from Vertis' Brief.

Page 17, Lines 17-20: (Correction in bold)

Original: "In Croft Metals, Inc., 348 NLRB 717 (2006) the Board held that those employees who were referred to as were not "supervisors" as defined under the Act because they did not have any supervisory authority being the responsibility to direct which was seen as "merely routine or clerical."")

Correction: “In Croft Metals, Inc., 348 NLRB 717 (2006), the Board held that those employees who were referred to as **supervisors** were not “supervisors” as defined under the Act because they did not have any supervisory authority being the responsibility to direct which was seen as “merely routine or clerical.” **Parens should be deleted at the end of the sentence.**

Page 26, Lines 10-11: (Correction in bold)

Original: “In fact, there is no evidence that any of the alleged ethic statements were heard by any employee.”

Correction: “In fact, there is no evidence that any of the alleged **ethnic** statements were heard by any employee.”

Page 41, Lines 6-8: (Correction in bold)

Original: “The Board held “that the president of the company , we do not view Respondent’s pre-election promises as coercive or as otherwise destructive of a free election choice.”

Correction: “The Board held **that it did not view [the president’s]** pre-election promises as coercive or as otherwise destructive of a free election choice.”

Page 44, Line 6: (Correction in bold)

Original: “They all occurred in passing out in the open on the shop floor.”

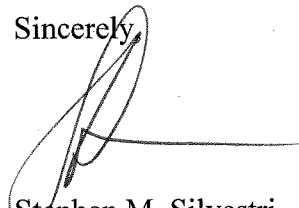
Correction: “They all occurred in the open on the shop floor.” **The phrase “in passing out” should be deleted.**

Page 44, Lines 22-23; Page 45, Lines 1-3:

Original: “In Stevens Creek Chrysler Jeep Dodge, 2011 NLRB LEXIS 470, *28-29 (2011), the Board concluded that supervisor unlawfully interrogated four of only thirteen employees in his office and asked them whether they attended the union meeting and signed cards, and threatened one of the employees during the interrogation that his pay would be cut if employees selected the Union.”

Correction: “In Stevens Creek Chrysler Jeep Dodge, 2011 NLRB LEXIS 470, *28-29 (2011), the Board concluded that a supervisor unlawfully interrogated four of only thirteen employees in his office **when he** asked them whether they attended the union meeting and signed cards, and **also** threatened one of the employees during the interrogation that his pay would be cut if employees selected the Union.”

Sincerely

A handwritten signature in black ink, appearing to read "Stephen M. Silvestri", with a long horizontal line extending to the right.

Stephen M. Silvestri
Counsel to Vertis, Inc.

SMA/kam

cc: Christopher Gant, Esquire (via e-mail)

J. Michael Lightner (via e-mail)
Regional Director
National Labor Relations Board