UNITED STATES OF AMERICA
BEFORE THE NATIONAL LABOR RELATIONS BOARD
EXECUTIVE SECRETARY OF THE BOARD

SUIZA DAIRY CORPORATION And MOVIMIENTO SOLIDARIO SINDICAL-INTERVENOR; CENTRAL GENERAL DE TRABAJADORES PETITIONER	CASE 24-RC-081423; 24-RC-081452

MOTION RELATING TO ENGLISH TRANSLATION OF EXHIBITS

BEFORE THE EXECUTIVE SECRETARY:

COMES NOW, **SUIZA DAIRY CORPORATION**, through the undersigned counsel, and very respectfully states, avers and prays as follows:

On June 15, 2012, Suiza Dairy filed an Appeal to "Region's Order Approving Waiver and Disclaimer of Interest and Revoking Certification" issued on June 12, 2012. As attachments to the same, Suiza Dairy filed documents in the Spanish language. On the same date, Suiza Dairy also requested an extension of time to translate the documents filed as Exhibits 1-4, to expire June 18, 2012.

WHEREFORE, the aforementioned documents have been translated to the English language, we are accompanying them with this Motion.

RESPECTFULLY SUBMITTED:

This 18th day of June of 2012 in San Juan, Puerto Rico, for Washington, DC.

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PATRICIA SILVA MUSALEM

CERTIFICATE OF SERVICE

I hereby certify that a copy of this Motion have been served on this same date, by mail, to the attention of Martha Figueroa, Regional Director (Region 24), at their office facilities at La Torre de Plaza, Suite 1002, 525 F.D. Roosevelt Avenue, San Juan, P.R; to David Rohena, at PO Box 192901, San Juan, PR 00919-2901; and Manuel A. Rodríguez Banchs, Esq.,at First Federal Bldg. Ste. 1001, 1056 Muñoz Rivera Ave., Río Piedras, P.R. 00927

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MSS PUBLICATION- NEWS BULLETIN #90 JUNE 2012
ADRESS: DEGETAU ST. #371, SANTURCE TEL. (787)268-5503 EMAIL: UNION@ONELINKPR.NET

THE MOVEMENT IN ACTION

M.S.S. Publication, Affiliated to Coordinadora Sindical

Wednesday June 20 we will vote for those who fight, the MSS.

Fellow Merchandisers;

The work of Movimiento Solidario Sindical has had a positive effect in Suiza during the past years, example of this is that we achieved to stop the GPS and we fought against the "agency" for the no sub-contracting of the merchandisers services.

Now, when we are preparing to bargaining, a union that has caused a lot of damage to workers of other places has filed an election petition. The CGT has deceived in Indualc, Fondo Fomento Industria Lechera and Allied Waste. In every place they have been the employees have lost benefits and rights.

Movimiento Solidario Sindical's genuine commitment and militancy. On June 20 vote MSS.

What does the cgt offer?

History proves its disasters

1.**Indulac**: Without Collective bargaining agreement since Mayo 2010. They never achieved to negotiate one and due to their negligence, they lost rights and benefits in the negotiating table.

2. **Fondo Fomento Industria Lechera** (FFIL): Here you will find the milk inspectors. After a year without a collective bargaining agreement the employees themselves removed the cgt to not lose benefits. The cgt abandoned the employees, including several terminated employees.

3. **Allied Wastes** (Before, BFI): cgt signed a collective bargaining agreement with less rights and 38 terminated employees. Unionized employees and their families were left without a health care plan for a year and betrayed by the promises made to them. The cgt abandoned the terminated workers.

Your family and the Suiza employees do not deserve this disaster. VOTE MSS MSS!

SUIZA DAIRY MERCHANDISERS UNITED WITH THE MSS

[PHOTO]

Suiza Dairy's merchandisers met in MSS's headquarters on May 10, 2012 to discuss fighting strategies for the next collective bargaining agreement.

The merchandisers know how the MSS has solved their problems and we are fighting hard so our rights are respected before the employer.

It is important for the merchandisers to be clear that on June 20 we have to vote for the Movimeinto Solidario Sindical. Likewise, they have to talk to indecisive salesmen and explain to them that voting for the MSS on said date represents employment security.

Commitment, Militancy and Fight.

NEWS BULLETIN OF THE CENTRAL GENERAL DE TRABAJADORES

Tel. 787-556-1268 email:cgtpuertorico@gmail.com
P.O. Box 192901 San Juan, PR, 00919-2901

OVER 80% OF SUPPORT FOR CGT FOR UNION ELECTIONS

During the past days, over 80% of the Suiza Dairy workers who belong to the bargaining units of Fleet and Sales-Merchandisers have endorsed the election petition filed by Central General de Trabajadores (CGT).

After two years of resisting the employer's blows, without the support and protection of an honest and loyal labor organization to our interest we finally had period of eligibility to petition a new election in which to elect the CGT as our new instrument of protection before the company. Last Monday we filed a petition for election with more than 80% of the petition cards singed even though the law requires only 30%. The overwhelming to the CGT at the onset of this campaign represents the force with which our Union counts to face the upcoming election. We need a Union that faces the employer, not a Union that is doubtful like the Movimient Solidario Sindical .

The President of MSS, Jose Rodriguez has proved to be a liar. He says something today and later he takes the knife and stabbed you in the back. In 2009, he lied and betrayed the Coca Cola employees during the strike by withdrawing the petition for election paving the way for the employer to terminate close to 100 employees. He then filed a petition for the Suiza the petition and left them to the employer's mercy and their corrupted union. In that fashion he has demonstrated to be a person in whom you can't trust, and much less in has to do with your money, health and your family's security.

Why does the CGT exist?

It exists because of what we have described before. When the workers and Suiza and Indulac leaders discovered the lie and dishonesty pattern of the MSS leaders and we saw the absolute control they have over the union, we decided to create a new struggle instrument called Central General de Trabajadores.

Since its establishment and without the CGT being our legal representative, they have been beside our leaders. They have assumed the representation of the majority of the terminated Suiza employees during this period. Especially in the case of our co-worker and important leader of our shop, David Rohena, who was terminated without justification because of his union activities in support of our rights and interests. We are committed to offer the best representation to Suiza Dairy's workers as we have been doing up to this moment.

Why vote for CGT?

By casting your vote for CGT you are bringing a union to Suiza that will gain the employer's respect and who defends the interests of its bargaining unit over any personal interest. By becoming members of this union we will integrate to a democratic and militant union project were our voices are heard and our participation in the internal life of the union is promoted. We will receive workshops of union information were we will discuss strategies as workers of Suiza and as members of the working clase of this country. The CGT guarantees active union representation, it has an honest and militant legal team and who visits its shops at least weekly to guarantee the protection and defense of our collective bargaining agreement.

VOTE

X

CGT

Vote for the CGT: Reasons Abound

Among them is that the employer has gotten its way. Ever since the MSS betrayed us and allied with the employer to retaliate for our disapproval, the company has taken advantage of the void to intensify the pressure and the exploitation to increase its profits without the existence of a union who could help us resist its policies. To the contrary, while the employer hurts us, the MSS looks to where the money is or it eats with the employer.

WE PROPOSE

- Weekly representative visits.
- Zero tolerance to employer's unilateral changes of working conditions.
- Changes to the unit's working conditions are discussed and decided for the workers.
- Zero secret agreements and meetings with the employer.
- Defense and protection of our delegates and our bargaining unit. Attention and priority to the employee's grievances against the employer.
- Negotiating Committee representing all classifications.
- Collective bargaining agreement discussed and ratified in assembly by the unit.
- Specialized legal team who responds to the worker's interests.
- We fight for the collective bargaining agreement that workers want. We don't sign the collective bargaining agreement the employer wants.

Last Minute Confirmation

Human Resourses Director, Manuel Velazquez, authorizes MSS campaign in Juncos' check/balance room. This is a desperate move by the employer, who facing the employee's massive rejection, decides to intervene to save the alliance between Jose Rodriguez, MSS president, and Francisco Perez, Suiza Dairy president. On June 6 MSS employees, Nelson Escudero y Carmen Rodriguez, received unprecedented preferential treatment when they were allowed to campaign in Junco's check/balance room. This preferential treatment towards the MSS is typical of labor unions and abusive employers. While this is happening the workers ask themselves: "Where is the dishonest Jose Rodriguez?".

[PHOTO]

CGT Scandal

Get informed and don't fall into the trap!

$1,000 dollars up front to defend you?

This is another example of deceit to workers. The CGT turned its back to those it swore to defend a while ago.

When they told a couple of employees that they would defend them for free, they got a rude awakening when the CGT lawyers demanded each employee $1,000 dollars to take their cases.

Who do they think they are? Are they thinking that we salesmen are rich? That money is an example of a union without economic stability and who does not have their own lawyers, making it up day after day.

Today those workers have come to the MSS's offices looking for our legal help and looking for new hope.

Even though the MSS does not charge a cent, we have never abandoned you, mean while those who lie about us are the first to betray you.

Don't fall in the trap of demagogy, the CGT is a business for two or three persons.

That is the way the swore to defend us?!

On the other hand, the MSS has achieved to better collective bargaining agreements with its struggle.

[Newspaper clipping]

MAY 2012 BULLETIN #88

MOVIMIENTO SOLIDARIO SINDICAL

MSS PUBLICATION/ AFFILIATED TO COORDINADORA SINDICAL/WWW.MSS.NET

"We stayed with those who have been there"

That is what us, Suiza Dairy salesmen of San Juan and Juncos say.

For example, we, as workers, feel the employer's pressure to sale more. Many times, that pressure is excessive. Who helps us? Who stops cold supervisors and managers?

The answer is simple: the **MSS**.

For us salesmen, those who put in danger our jobs and benefits and use us as bait for their personal interests have no place.

Even with the boycott of some, the **MSS** has never abandoned us. Some have tried to destroy our union, but the **MSS** has stood solid, like an oak tree and fighting for us. That shows a high degree of commitment with the salesmen and at the end of the day, that is the most important.

We salesmen stay with those who defend our money and better our benefits for a second consecutive time. You don't change what is good. Deceit does not fly with us.

With the MSS, always!

LOOK AT THE MSS SUPPORT FOTOS SOON in FACEBOOK Movimiento Solidario SIndical

[PICUTRE]

Another federal charge against Suiza for bad faith bargaining

The **MSS** filed another charge of unfair labor practice against Suiza for bad faith bargaining with the union.

Recently the company amended the Portable Electronic Equipment Control Policy and did not advise the MSS to bargain.

The company knows that all changes made to our working conditions have to be negotiated with the workers and their union.

Sometimes it is necessary to remind them with street and legal pressure of this fact. Thanks to the union we have the right to decide over what affects us.

The Suiza workers do not accept more impositions, we want negotiations.

Through the filing of charges we have achieved to frustrate the company's plans that affect us negatively.

MOVIMIENTO SOLIDARIO SINDICAL HERE AND NOW!

NEWS BULLETIN OF CENTRAL GENERAL DE TRABAJADORES

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UNION ELECTIONS
JUNE 20, 2012
11:00 a.m. - 6:30 p.m.

CENTRAL GENERAL DE TRABAJADORES The Union that represents and fights for ALL Suiza Dairy workers. X	Movimiento Solidario Sindical Anti-Democratic Union with a dishonest presidente who represents Suiza's interests	NONE Voting here means voting for the employer .....

VOTE X FOR THE CGT

Click "LIKE" to CGT in Facebook The name of the group is Central General de Trabajadores