

**BEFORE THE NATIONAL LABOR RELATIONS BOARD
WASHINGTON, D. C.**

Quality Health Services of Puerto Rico Inc.
d/b/a Hospital San Cristobal
Respondent/Employer

Case 24-CA-011630

and

Unidad Laboral de Enfermeras(os) and
Empleados de la Salud
Charging Party Union

**URGENT MOTION REQUESTING AMENDMENT AND CORRECTION OF THE
DECISION AND ORDER ISSUED BY THE BOARD**

COMES NOW, Unidad Laboral de Enfermeras(os) and Empleados de la Salud, herein called ULEES and/or the Charging Party Union, through the undersigned legal representative, and very respectfully alleges, states and requests as follows:

1. The Board issued its Decision and Order in the above captioned matter on June 25, 2012.
2. A copy of the Decision and Order was received by the ULEES on June 29, 2012.
3. The Decision and Order is defective and inconsistent with the findings, rulings and conclusions made by Administrative Law Judge George Aleman, in the initial decision,(the same which were adopted by the Board).
4. Judge Aleman found violations and ordered remedies for the Respondent's nurses employed in two bargaining units represented by the Charging Party Union, namely, the Licensed Practical Nurses unit and additionally, **the Registered Nurses Unit** (my emphasis). See **footnote #4** of the ALJ decision for a complete description of the two units of nursing employes represented by the union.

5. In contrast, the Board's Decision and Order that issued only includes a remedy for a single unit, that of the Licensed Practical Nurses, and did not include a remedy for the RN unit nurses. However, it is clear that the RN nurses are entitled to be included in the remedy ordered in the instant case as was found and ordered by Judge Aleman and likewise, they must be made whole and receive back pay plus interest and any other remedy ordered by the Board.

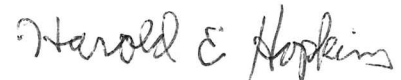
6. It appears that the Board's Decision and Order simply left out and omitted "**the RN nurses unit**" in its Decision and Order. The Board must amend its Decision and Order at Paragraph 1(a) and likewise amend its "Notice to Employees" in the Appendix to include reference to the RN nurses unit.

7. It should be noted that paragraphs 1 (b), (c) and (d) and paragraph 2 (a) to (g) of the Board's Decision and Order do not need to be amended.

WHEREFORE, the Charging Party Union, respectfully requests that the Honorable Board take notice of the above and correct its Decision and Order and/or issue an Amended Decision to include the RN Nurses Unit and include the (RN) nurses in the remedy as was ordered by Judge Aleman

RESPECTFULLY SUBMITTED at San Juan, Puerto Rico this July 11, 2012.

(Signed: Harold E. Hopkins)



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CERTIFICATE OF SERVICE

I hereby certify that on this same date I have sent a true copy of the aforesaid motion to the following:

Ana Ramos Counsel for the General Counsel
NLRB, Region 24
by Fax to (787) 766-5478

Jose Oliveras, Esq.
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→ also By Email:
JAOLIVERAS@Caribe.Net

At San Juan, PR this 11 July 2012

(Signed: Harold E. Hopkins, Esq.)

Harold E. Hopkins