

UNITED STATES OF AMERICA
BEFORE THE NATIONAL LABOR RELATIONS BOARD
REGION 2

HEALTHBRIDGE MANAGEMENT, LLC; 107
OSBORNE STREET OPERATING COMPANY II,
LLC D/B/A DANBURY HCC; 710 LONG RIDGE
ROAD OPERATING COMPANY II, LLC D/B/A
LONG RIDGE OF STAMFORD; 240 CHURCH
STREET OPERATING COMPANY II, LLC D/B/A
NEWINGTON HEALTH CARE CENTER; 1 BURR
ROAD OPERATING COMPANY II, LLC D/B/A
WESTPORT HEALTH CARE CENTER; 245
ORANGE AVENUE OPERATING COMPANY II,
LLC D/B/A WEST RIVER HEALTH CARE
CENTER; 341 JORDAN LANE OPERATING
COMPANY II, LLC D/B/A WETHERSFIELD
HEALTH CARE CENTER,

And

NEW ENGLAND HEALTH CARE EMPLOYEES
UNION, DISTRICT 1199 SEIU, AFL-CIO,

And

CARE REALTY, LLC, PARTY IN INTEREST

CASE NOS. 34-CA-12964
34-CA-13064

**RESPONDENTS' EXCEPTIONS
TO ADMINISTRATIVE LAW JUDGE'S DECISION**

Submitted By:

**George W. Loveland, II
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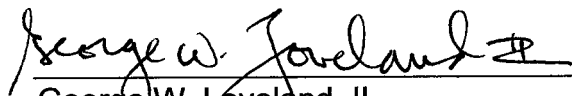
Exceptions to the Administrative Law Judge's Findings and Conclusions of Law

Respondents except to the following findings and conclusions of law on the ground that they are not supported by the record evidence and are contrary to established Board law:

- 1) Respondents except to the Administrative Law Judge's (the "ALJ") finding and conclusion that removal of the Busted Flyer in accord with provisions of the applicable Collective Bargaining Agreements violated Section 8(a)(1) of the Act. (ALJD 14:33–34).
- 2) Respondents except to the ALJ's finding and conclusion that the Busted Flyer was a proper union notice. (ALJD 14:4–7).
- 3) Respondents except to the ALJ's finding and conclusion that the Busted Flyer was not defamatory, outrageous, and inflammatory. (ALJD 14:22–24).
- 4) Respondents except to the ALJ's finding and conclusion that Dr. Warner-Maron's testimony was speculative, unsubstantiated surmise, and subjective belief. (ALJD 17:46–18:1).
- 5) Respondents except to the ALJ's finding and conclusion that Respondents did not establish that special circumstances permitted the ban of the Busted Sticker in immediate patient care areas. (ALJD 19:31–32).

6) Respondents except to the ALJ's finding and conclusion that special circumstances permitted Respondents to ban the Busted Sticker outside immediate patient care areas. (ALJD 19:19-27, 19:32-34).

Respectfully submitted,



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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of this Brief in Support of Respondents' Exceptions was served upon the following persons, this the 17th day of August, 2012, in the manner indicated:

Lester A. Heltzer, Executive Secretary
National Labor Relations Board
1099 14th St. N.W.
Washington, D.C. 20570-0001

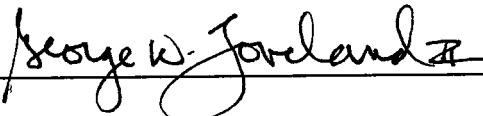
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