

**UNITED STATES OF AMERICA
BEFORE THE NATIONAL LABOR RELATIONS BOARD**

STARRS GROUP HOME, INC.

and

05-CA-036537

RAYMOND A. BARNES

**MOTION TO TRANSFER PROCEEDINGS TO THE
BOARD AND MOTION FOR DEFAULT JUDGMENT**

Pursuant to Sections 102.24 and 102.50 of the National Labor Relations Board Rules and Regulations and Statement of Standard Procedures, Series 8, as amended, herein called the Rules, Counsel for the Acting General Counsel respectfully moves that the National Labor Relations Board, herein referred to as the Board: (1) transfer this case and continue proceedings before the Board; (2) deem the allegations set forth in the Compliance Specification and Notice of Hearing in Case 05-CA-036537, issued on November 30, 2012, as admitted to be true without taking evidence supporting the allegations in the Compliance Specification ; and (3) grant Default Judgment and issue a Decision and Order herein on the basis of the following:

1. On November 30, 2012, the Regional Director for Region 5 issued a Compliance Specification and Notice of Hearing, herein called the Compliance Specification, in the above-captioned matter. A copy of the Compliance Specification, Affidavit of Service, and proof of receipt are attached hereto as Acting General Counsel Exhibits 1, 2, and 3.
2. The Compliance Specification states, in pertinent part, that Respondent shall file an answer to the Compliance Specification by December 21, 2012, and absent such action, all the allegations in the Compliance Specification may be deemed to be true and may be so found by the Board. Respondent did not file an answer to the Compliance Specification by December 21, 2012.

3. By letter dated January 11, 2013, Respondent was advised by the Region 5 Regional Attorney that Respondent had not filed an answer to the Compliance Specification, and absent the filing of an answer to the Compliance Specification by January 18, 2013, a Motion for Default Judgment would be filed. To date, no answer has been filed and Respondent has provided no evidence of a satisfactory reason for its failure to file an answer. A copy of the January 11, 2013 letter to Respondent and proof of receipt are attached hereto as Acting General Counsel Exhibits 4 and 5.

4. On January 31, 2013, the Regional Director issued, by certified United States mail, an Order Postponing Hearing Indefinitely. A copy of the Order Postponing Hearing Indefinitely and the Affidavit of Service are attached hereto as Acting General Counsel Exhibits 6 and 7.

WHEREFORE, Counsel for the Acting General Counsel respectfully requests, in accordance with Section 102.24 and 102.50 of the Rules, that the Board deem all matters alleged in the Compliance Specification to be true, and that they be so found, and that a Decision and Order be issued containing findings of fact, conclusions of law, and an appropriate remedy for the violations herein.

Dated at Baltimore, Maryland, this 1st day of February 2013.

Respectfully submitted,

/s/Chad M. Horton

Chad M. Horton
Counsel for the Acting General Counsel
National Labor Relations Board, Region 5
100 S. Charles St., Tower II
Suite 600
Baltimore, MD 21201

CERTIFICATE OF SERVICE

I hereby certify that on February 1, 2013, the following individuals were informed by telephone that a copy of the Counsel for the Acting General Counsel's Motion to Transfer Proceedings to the Board and Motion for Default Judgment was being electronically filed on February 1, 2013, and that a copy was being sent by United Parcel Service overnight delivery to these individuals:

Ms. Barbara Parker
Starrs Group Home, Inc.
19 Placid Woods Court
Baltimore, MD 21234-1161
(443) 790-0216

Mr. Raymond Barnes
930 Lemmon St.
Baltimore, MD 21223-2608
(443) 806-2781

/s/ Chad M. Horton

Chad M. Horton
Counsel for the Acting General Counsel
National Labor Relations Board, Region 5
100 S. Charles St., Tower II
Suite 600
Baltimore, MD 21201

UNITED STATES OF AMERICA
BEFORE THE NATIONAL LABOR RELATIONS BOARD
REGION 5

STARRS GROUP HOME, INC.

and

Case 05-CA-036537

RAYMOND A. BARNES, AN INDIVIDUAL

COMPLIANCE SPECIFICATION AND
NOTICE OF HEARING

On October 14, 2011, the National Labor Relations Board, herein called the Board, issued its Order, 357 NLRB No. 100, finding that Starrs Group Home, Inc., herein referred to as Respondent, had engaged in unfair labor practices within the meaning of Section 8(a)(1) of the Act. The Board ordered Respondent, inter alia:

- A. To offer Raymond A. Barnes, herein also called the discriminatee, full reinstatement to his former position.
- B. To make Raymond A. Barnes whole, with interest, for any monetary losses suffered as the result of the discrimination against him.
- C. To remove from its files any reference to the unlawful suspension, reduction in hours and discharge of Raymond A. Barnes and notify him in writing that this has been done and that the unlawful actions will not be used against him in any way.
- D. To post the Notice to Employees.

On August 30, 2012, the United States Court of Appeals for the Fourth Circuit in Case No. 12-1912, entered its judgment enforcing in full the Board's Order.

Respondent has taken limited steps to comply with the Order by posting the Notice to Employees, offering reinstatement to Raymond A. Barnes and making one payment of \$220.20 toward its backpay liability. Respondent has neither removed from its files the references to its unlawful actions against Raymond A. Barnes, notified him in writing that this has been done and that the unlawful actions will not be used against him in any way, nor made him whole for the remainder of the monetary losses suffered as a result of the discrimination against him.

Controversy having arisen over the amount of backpay due under the terms of the Board's Order, and Respondent having failed to comply with its obligation to expunge from its records any reference to the unlawful actions taken against the discriminatee, and in order to liquidate the amount of backpay due Raymond A. Barnes, the undersigned Regional Director of the National Labor Relations Board for the Fifth Region, pursuant to the authority duly conferred upon him by the Board, hereby issues this Compliance Specification and alleges the following:

1. The backpay periods for Raymond A. Barnes include:
 - (a) suspension from November 2, 2010 until November 12, 2010;
 - (b) assignment of a less than full-time schedule for the period January 1, 2011 through February 6, 2011; and;
 - (c) the period from his termination on February 6, 2011, until May 16, 2011, the date he waived his right to reinstatement pursuant to Respondent's offer of reinstatement on the same date.
2. An appropriate measure of gross backpay for the discriminatee is the amount he would have earned if he: had not been suspended from November 2, 2010 through

November 12, 2010; had worked a full-time schedule from January 1, 2011 through February 6, 2011; and had been continually employed by Respondent from February 6, 2011 through May 16, 2011.

3. (a) The calendar quarter gross backpay the discriminatee would have earned is defined as the sum of calendar quarter regular earnings and overtime earnings and is set forth in Exhibit A.

(b) Regular earnings are computed by multiplying the number of regular hours the discriminatee would have worked in the calendar quarter by the appropriate wage rate, as set forth in paragraph 3(h).

(c) The discriminatee would not have worked any overtime hours during the backpay periods.

(d) Regular hours are based on the average regular hours the discriminatee worked during the three pay periods prior to the discrimination against him.

(e) During the calendar quarter that includes the backpay period described above in paragraph 1(a) the discriminatee would have worked 392 regular hours, as set forth in Exhibit A.

(f) During the calendar quarter that includes the backpay period described above in paragraph 1(b) the discriminatee would have worked a full-time schedule of 510 regular hours, as set forth in Exhibit A.

(g) During the calendar quarter that includes the backpay period described above in paragraph 1(c) the discriminatee would have worked 263 regular hours, as set forth in Exhibit A.

(h) The appropriate hourly wage rates for the discriminatee are:

(i) \$10.00 per hour for the period November 2, 2010 through January 31, 2011;

(ii) \$11.00 per hour for the period February 1, 2011 through May 16, 2011.

4. (a) Calendar quarter earnings are the wages the discriminatee was paid by Respondent during the backpay period, computed on a quarterly basis. Calendar quarter earnings are set forth in Exhibit A.

(b) The discriminatee did not have any calendar quarter earnings from interim employers during the backpay period.

5. The calendar quarter net backpay is the difference between the calendar quarter gross backpay and calendar quarter earnings. The calendar quarter net backpay due is set forth in Exhibit A.

6. The total backpay due is the difference between the total calendar quarter net backpay and the April 4, 2012 backpay payment. The total backpay due is set forth in Exhibit A.

7. Respondent has failed to comply with its obligation to expunge from its records any reference to the unlawful actions taken against Raymond A. Barnes, and notify him in writing that this has been done and that the unlawful actions will not be used against him in any way.

SUMMARY

Summarizing the facts and calculations specified above and on Exhibit A, the obligation of Respondent to make whole the discriminatee under the Board's Order for the period

November 2, 2010 through May 16, 2011, will be discharged by the payment to Raymond A. Barnes of \$8,412.80 in backpay as described in Exhibit A, plus interest to date of payment and the Employer's share of FICA contributions. Respondent's obligation to expunge from its records any reference to the unlawful actions taken against Raymond A. Barnes will be discharged by the removal of such references from Respondent's files and the issuance of a letter to Barnes notifying him that Respondent has removed from its files the references to its unlawful actions against him and that the unlawful actions will not be used against him in any way.

ANSWER REQUIREMENT

Respondent is notified that, pursuant to Section 102.56 of the Board's Rules and Regulations, it must file an answer to the compliance specification. The answer must be **received by this office on or before December 21, 2012, or postmarked on or before December 20, 2012.** Unless filed electronically in a pdf format, Respondent should file an original and four copies of the answer with this office and serve a copy of the answer on each of the other parties.

An answer may also be filed electronically by using the E-Filing system on the Agency's website. In order to file an answer electronically, access the Agency's website at <http://www.nlr.gov> , click on **E-Gov**, then click on the **E-Filing** link on the pull-down menu. Click on the "File Documents" button under "Regional, Subregional and Resident Offices" and then follow the directions. The responsibility for the receipt and usability of the answer rests exclusively upon the sender. Unless notification on the Agency's website informs users that the Agency's E-Filing system is officially determined to be in technical failure because it is unable to receive documents for a continuous period of more than 2 hours after 12:00 noon (Eastern

Time) on the due date for filing, a failure to timely file the answer will not be excused on the basis that the transmission could not be accomplished because the Agency's website was off-line or unavailable for some other reason. The Board's Rules and Regulations require that such answer be signed and sworn to by the respondent or by a duly authorized agent with appropriate power of attorney affixed. See Section 102.56(a). If the answer being filed electronically is a pdf document containing the required signature, no paper copies of the answer need to be transmitted to the Regional Office. However, if the electronic version of an answer to a compliance specification is not a pdf file containing the required signature, then the E-filing rules require that such answer containing the required signature be submitted to the Regional Office by traditional means within three (3) business days after the date of electronic filing.

Service of the answer on each of the other parties must be accomplished in conformance with the requirements of Section 102.114 of the Board's Rules and Regulations. The answer may not be filed by facsimile transmission.

As to all matters set forth in the compliance specification that are within the knowledge of Respondent, including but not limited to the various factors entering into the computation of gross backpay, a general denial is not sufficient. See Section 102.56(b) of the Board's Rules and Regulations, a copy of which is attached. Rather, the answer must state the basis for any disagreement with any allegations that are within the Respondent's knowledge, and set forth in detail Respondent's position as to the applicable premises and furnish the appropriate supporting figures.

If no answer is filed or if an answer is filed untimely, the Board may find, pursuant to a Motion for Default Judgment, that the allegations in the compliance specification are true. If the answer fails to deny allegations of the compliance specification in the manner required under

EXHIBIT A

Calendar Quarter	Regular Hours	Calendar Quarter Gross Backpay	Calendar Quarter Earnings	Calendar Quarter Net Backpay
4Q 2010	392	\$3,920.00	\$3,300.00	\$620.00
1Q 2011	510	\$5,440.00	\$320.00	\$5,120.00
2Q 2011	263	\$2,893.00		\$2,893.00
Total Calendar Quarter Net Backpay				\$8,633.00
April 4, 2012 Backpay Payment				\$220.20
Total Backpay Due				\$8,412.80

Section 102.56(b) of the Board's Rules and Regulations, and the failure to do so is not adequately explained, the Board may find those allegations in the compliance specification are true and preclude Respondent from introducing any evidence controverting those allegations.

NOTICE OF HEARING

PLEASE TAKE NOTICE that commencing at 10:00 a.m., E.D.T., on the 19th day of February 2013, and on consecutive days thereafter, a hearing will be conducted in Hearing Room A, Tower II, Bank of America Center, 100 S. Charles Street, Suite 600, Baltimore, Maryland, before an Administrative Law Judge of the National Labor Relations Board. At the hearing, Respondent and any other party to this proceeding have the right to appear and present testimony regarding the allegations in the compliance specification. The procedures to be followed at the hearing are described in the attached Form NLRB-4668. The procedure to request a postponement of the hearing is described in the attached Form NLRB-4338.

Dated at Baltimore, Maryland this 30th day of November 2012.



Wayne R. Gold, Regional Director
National Labor Relations Board, Region 5
Bank of America Center, Tower II
100 South Charles Street, Suite 600
Baltimore, MD 21201

**SUMMARY OF STANDARD PROCEDURES IN FORMAL HEARINGS HELD
BEFORE THE NATIONAL LABOR RELATIONS BOARD
IN UNFAIR LABOR PRACTICE PROCEEDINGS PURSUANT TO
SECTION 10 OF THE NATIONAL LABOR RELATIONS ACT**

The hearing will be conducted by an administrative law judge of the National Labor Relations Board who will preside at the hearing as an independent, impartial finder of the facts and applicable law whose decision in due time will be served on the parties. The offices of the administrative law judges are located in Washington, DC; San Francisco, California; New York, N.Y.; and Atlanta, Georgia.

At the date, hour, and place for which the hearing is set, the administrative law judge, upon the joint request of the parties, will conduct a "prehearing" conference, prior to or shortly after the opening of the hearing, to ensure that the issues are sharp and clearcut; or the administrative law judge may independently conduct such a conference. The administrative law judge will preside at such conference, but may, if the occasion arises, permit the parties to engage in private discussions. The conference will not necessarily be recorded, but it may well be that the labors of the conference will be evinced in the ultimate record, for example, in the form of statements of position, stipulations, and concessions. Except under unusual circumstances, the administrative law judge conducting the prehearing conference will be the one who will conduct the hearing; and it is expected that the formal hearing will commence or be resumed immediately upon completion of the prehearing conference. No prejudice will result to any party unwilling to participate in or make stipulations or concessions during any prehearing conference.

(This is not to be construed as preventing the parties from meeting earlier for similar purposes. To the contrary, the parties are encouraged to meet prior to the time set for hearing in an effort to narrow the issues.)

Parties may be represented by an attorney or other representative and present evidence relevant to the issues. All parties appearing before this hearing who have or whose witnesses have handicaps falling within the provisions of Section 504 of the Rehabilitation Act of 1973, as amended, and 29 C.F.R. 100.603, and who in order to participate in this hearing need appropriate auxiliary aids, as defined in 29 C.F.R. 100.603, should notify the Regional Director as soon as possible and request the necessary assistance.

An official reporter will make the only official transcript of the proceedings, and all citations in briefs and arguments must refer to the official record. The Board will not certify any transcript other than the official transcript for use in any court litigation. Proposed corrections of the transcript should be submitted, either by way of stipulation or motion, to the administrative law judge for approval.

All matter that is spoken in the hearing room while the hearing is in session will be recorded by the official reporter unless the administrative law judge specifically directs off-the-record discussion. In the event that any party wishes to make off-the-record statements, a request to go off the record should be directed to the administrative law judge and not to the official reporter.

Statements of reasons in support of motions and objections should be specific and concise. The administrative law judge will allow an automatic exception to all adverse rulings and, upon appropriate order, an objection and exception will be permitted to stand to an entire line of questioning.

All exhibits offered in evidence shall be in duplicate. Copies of exhibits should be supplied to the administrative law judge and other parties at the time the exhibits are offered in evidence. If a copy of any exhibit is not available at the time the original is received, it will be the responsibility of the party offering such exhibit to submit the copy to the administrative law judge before the close of hearing. In the event such copy is not submitted, and the filing has not been waived by the administrative law judge, any ruling receiving the exhibit may be rescinded and the exhibit rejected.

Any party shall be entitled, on request, to a reasonable period of time at the close of the hearing for oral argument, which shall be included in the transcript of the hearing. In the absence of a request, the administrative law judge may ask for oral argument if, at the close of the hearing, it is believed that such argument would be beneficial to the understanding of the contentions of the parties and the factual issues involved.

In the discretion of the administrative law judge, any party may, on request made before the close of the hearing, file a brief or proposed findings and conclusions, or both, with the administrative law judge who will fix the time for such filing. Any such filing submitted shall be double-spaced on 8 1/2 by 11 inch paper.

Attention of the parties is called to the following requirements laid down in Section 102.42 of the Board's Rules and Regulations, with respect to the procedure to be followed before the proceeding is transferred to the Board:

No request for an extension of time within which to submit briefs or proposed findings to the administrative law judge will be considered unless received by the Chief Administrative Law Judge in Washington, DC (or, in cases under the branch offices in San Francisco, California; New York, New York; and Atlanta, Georgia, the Associate Chief Administrative Law Judge) at least 3 days prior to the expiration of time fixed for the submission of such documents. Notice of request for such extension of time must be served simultaneously on all other parties, and proof of such service furnished to the Chief Administrative Law Judge or the Associate Chief Administrative Law Judge, as the case may be. A quicker response is assured if the moving party secures the positions of the other parties and includes such in the request. All briefs or proposed findings filed with the administrative law judge must be submitted in triplicate, and may be printed or otherwise legibly duplicated with service on the other parties.

In due course the administrative law judge will prepare and file with the Board a decision in this proceeding, and will cause a copy thereof to be served on each of the parties. Upon filing of this decision, the Board will enter an order transferring this case to itself, and will serve copies of that order, setting forth the date of such transfer, on all parties. At that point, the administrative law judge's official connection with the case will cease.

The procedure to be followed before the Board from that point forward, with respect to the filing of exceptions to the administrative law judge's decision, the submission of supporting briefs, requests for oral argument before the Board, and related matters, is set forth in the Board's Rules and Regulations, particularly in Section 102.46 and following sections. A summary of the more pertinent of these provisions will be served on the parties together with the order transferring the case to the Board.

Adjustments or settlements consistent with the policies of the National Labor Relations Act reduce government expenditures and promote amity in labor relations. If adjustment appears possible, the administrative law judge may suggest discussions between the parties or, on request, will afford reasonable opportunity during the hearing for such discussions.

UNITED STATES GOVERNMENT
NATIONAL LABOR RELATIONS BOARD
NOTICE

Case: 05-CA-36589 & 05-CA-65438

The issuance of the notice of formal hearing in this case does not mean that the matter cannot be disposed of by agreement of the parties. On the contrary, it is the policy of this office to encourage voluntary adjustments. The examiner or attorney assigned to the case will be pleased to receive and to act promptly upon your suggestions or comments to this end. An agreement between the parties, approved by the General Counsel, would serve to cancel the hearing.

However, unless otherwise specifically ordered, the hearing will be held at the date, hour, and place indicated. Postponements **will not be granted** unless good and sufficient grounds are shown **and** the following requirements are met:

(1) The request must be in writing. An original and two copies must be filed with the General Counsel and with the Chief Administrative Law Judge in Washington, D.C.

(2) Grounds must be set forth in **detail**;

(3) Alternative dates for any rescheduled hearing must be given;

(4) The positions of all other parties must be ascertained in advance by the requesting party and set forth in the request; **and**

(5) Copies must be simultaneously served on all other parties (*listed below*), and that fact must be noted on the request.

Except under the most extreme conditions, no request for postponement will be granted during the three days immediately preceding the date of hearing.

RESPONDENT:

MS. BARBARA PARKER
STARRS GROUP HOME, INC.
19 PLACID WOODS COURT
BALTIMORE, MD 21234

CHARGING PARTY:

MR. RAYMOND BARNES
930 LEMMON STREET
BALTIMORE, MD 21234

UNITED STATES OF AMERICA
BEFORE THE NATIONAL LABOR RELATIONS BOARD

STARRS GROUP HOME, INC.
and
RAYMOND A. BARNES, AN INDIVIDUAL

Case 05-CA-036537

DATE OF MAILING 11/30/2012

AFFIDAVIT OF SERVICE OF Compliance Specification and Notice of Hearing

I, the undersigned employee of the National Labor Relations Board, certify that on the date indicated above I served the above-entitled document(s) by post-paid mail upon the following persons, addressed to them at the following addresses:

7010 0290 0000 2149 7176

RESPONDENT:

MS. BARBARA PARKER
STARRS GROUP HOME, INC.
19 PLACID WOODS COURT
BALTIMORE, MD 21234

CHARGING PARTY:

MR. RAYMOND BARNES
930 LEMMON STREET
BALTIMORE, MD 21234

7010 0290 0000 2149 7176

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Postage	\$	11-30-12 Postmark Here 5-CA-36537 STARRS Group
Certified Fee		
Return Receipt Fee (Endorsement Required)		
Restricted Delivery Fee (Endorsement Required)		
Total Postage & Fees	\$	
Sent To B. PARKER		
Street, Apt. No., or PO Box No. 19 Placid Woods Court		
City, State, ZIP+4 Baltimore, MD 21234		
PS Form 3800, August 2008		See Reverse for Instructions

11/30/2012

Date

William Szabo

Compliance Assistant

Print Name

Title

William Szabo

Signature



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United States Government
NATIONAL LABOR RELATIONS BOARD

Region 5

Bank of America Center – Tower II
100 South Charles Street, Suite 600
Baltimore, MD 21201

January 11, 2013

MS. BARBARA PARKER
STARRS GROUP HOME, INC.
19 PLACID WOODS COURT
BALTIMORE, MD 21234-1161

Re: Starrs Group Home, Inc.
Case 5-CA-36537

Dear Ms. Parker:

As you are aware from the Compliance Specification and Notice of Hearing in the above-captioned case, and pursuant to Sections 102.20 and 102.21 of the Board's Rules and Regulations, a Respondent in a case before the National Labor Relations Board shall file with the Regional Director an original and four (4) copies of an answer to the Complaint within fourteen (14) days from the service thereof. Respondent's Answer was due in this office by close of business on December 21, 2012. The Complaint also notified you that Respondent shall serve a copy of its answer on each of the other parties.

To date, this office has not received an Answer from Respondent. Please be advised that if an Answer is not received in this office by close of business on Friday, January 18, 2013, this office will file a Motion for Default Judgment pursuant to Sections 102.23(a), (b) and 102.50 of the Board's Rules and Regulations, asking the Board to find the allegations in the Compliance Specification to be admitted as true. Enclosed is a courtesy copy of the Compliance Specification and Notice of Hearing, previously served on Respondent.

If you have any questions or wish to discuss this matter further, please do not hesitate to call me at (410) 962-2811.

Very truly yours,

Albert W. Palewicz

Albert W. Palewicz
Regional Attorney

Enclosure

Certified Mail No. 7012 2210 0000 4815 5901

Cc: MR. RAYMOND BARNES
930 LEMMON STREET
BALTIMORE, MD 21223-2608

Acting General Counsel Ex. 4



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YOUR LABEL NUMBER	SERVICE	STATUS OF YOUR ITEM	DATE & TIME	LOCATION	FEATURES
70122210000048155901		Delivered Arrival at Unit	January 12, 2013, 2:31 pm January 12, 2013, 5:26 am	PARKVILLE, MD 21234 PARKVILLE, MD 21234	Certified Mail™

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**UNITED STATES OF AMERICA
BEFORE THE NATIONAL LABOR RELATIONS BOARD
REGION 5**

STARRS GROUP HOME, INC.

and

Case 5-CA-36537

RAYMOND A. BARNES, AN INDIVIDUAL

ORDER POSTPONING HEARING INDEFINITELY

IT IS HEREBY ORDERED that the hearing scheduled in the above-entitled matter for February 19, 2013, in Baltimore, Maryland, be, and the same hereby is, postponed indefinitely.

Dated at Baltimore, Maryland this 31st day of January 2013.

(SEAL)

WAYNE R. GOLD

Wayne R. Gold, Regional Director
National Labor Relations Board, Region 5
Bank of America Center -Tower II
100 South Charles Street, Suite 600
Baltimore, Maryland 21201

**UNITED STATES OF AMERICA
BEFORE THE NATIONAL LABOR RELATIONS BOARD**

STARRS GROUP HOME, INC.

and

RAYMOND A. BARNES, AN INDIVIDUAL

Case 5-CA-36357

DATE OF MAILING January 31, 2013

AFFIDAVIT OF SERVICE OF Order Postponing Hearing Indefinitely

I, the undersigned employee of the National Labor Relations Board, being duly sworn, depose and say that on the date indicated above I served the above-entitled document(s) by post-paid certified mail upon the following persons, addressed to them at the following addresses:

7012 2210 0000 4815 6014

MS. BARBARA PARKER
STARRS GROUP HOME, INC.
19 PLACID WOODS COURT
BALTIMORE, MD 21234-1161

MR. RAYMOND BARNES
930 LEMMON STREET
BALTIMORE, MD 21223-2608

<p>Signed in Baltimore, Maryland this 31st day of January 2013</p>	<p>DESIGNATED AGENT /s/ <i>Monica Graves</i> NATIONAL LABOR RELATIONS BOARD</p>
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