UNITED STATES OF AMERICA
BEFORE THE NATIONAL LABOR RELATIONS BOARD

REGENCY HERITAGE NURSING AND
REHABILITATION CENTER

AND Case 22-CA-074343

1199 SEIU, UNITED HEALTHCARE WORKERS
EAST, NEW JERSEY REGION

Respondent excepts to the ALJD at page 18, lines 30-53, and at page 19 lines 1-41 in that the ALJ rejected the claim that there is no duty to bargain before changing minimum rates of pay for future post probationary employyes. (See brief in support of exceptions at "Point 1")

Respondent excepts to the ALJD at 20 lines 3-38 and at 21 lines 1-49, in that the ALJ rejected the Respondent's arguments for deferral to the extant arbitration proceeding. (See brief at "Point 3")

Respondent excepts to the ALJD at 23 lines 13-47, 24 lines 1-10 and 30-33, footnote 31 at lines 50-51, at 25 lines 9-31 and 38-40, 43-47, at 26 lines 1-16, 27-48, at 27 lines 18-46, at 29 lines 4-23 and at footnote 34, at 30 lines 25-28, at 31 lines 1-49 in that the ALJD rejected the 10(b) defense posed by the Respondent. (See brief at "Point 2")

Respondent excepts to the ALJD at 32 lines 21-24 and lines 33-41, 43-47, and at 33 lines 23-29, 34-45 in that the ALJD awarded remedies where there were no violations and adopted new remedies not traditionally awarded by the Board, and awarded remedies that are punitive and that exceed make whole relief and that extend beyond the 10(b) period. (See also brief at “Point 4")

Respectfully submitted

/s/

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