UNITED STATES OF AMERICA
BEFORE THE NATIONAL LABOR RELATIONS BOARD
DIVISION OF JUDGES

STEWARD GOOD SAMARITAN MEDICAL CENTER **and** **CAMILLE A. LEGLEY, JR., An Individual**	**CASE 01-CA-082367**
1199SEIU HEATHCARE WORKERS EAST **and** **CAMILLE A. LEGLEY, JR., An Individual**	**CASE 01-CB-082365**

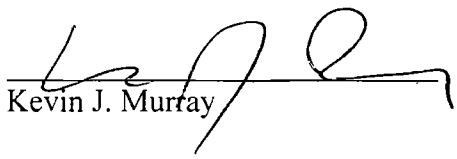
COUNSELS' FOR THE ACTING GENERAL COUNSEL BRIEF IN SUPPORT OF LIMITED EXCEPTIONS TO THE DECISION OF THE ADMINISTRATIVE LAW JUDGE

The Administrative Law Judge, apparently inadvertently, failed to include in his Order an order requiring Respondents to pay Camille Legley reimbursement of amounts equal to the differences in taxes owed upon receipt of a lump-sum payment and taxes that would have been owed had there been no discrimination, in accordance with the Board's decision in *Latino Express*, 359 NLRB No. 44 (2012). Since such an order is now required under *Latino Express*, supra, and since Counsels for the Acting General Counsel requested this Order in the Complaint and Brief, it is respectfully requested that the Board include this provision in its Order.

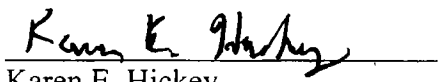
The Administrative Law Judge, also apparently inadvertently, failed to include in his Order an order that Respondent Steward Good Samaritan be required to submit appropriate documentation to the Social Security Administration so that when back pay is paid to Camille Legley, it will be allocated to the appropriate periods, in accordance with *Latino Express*, 359

NLRB No. 44 (2012). Since such an order is now required under *Latino Express*, supra, and since Counsels for the Acting General Counsel requested this order in the Complaint and Brief, it is respectfully requested that the Board include this provision in its Order.

Dated at Boston, Massachusetts this 30th day of September, 2013.



Kevin J. Murray



Karen E. Hickey
Counsels for the Acting General Counsel
National Labor Relations Board
Region 01
O'Neill Federal Building
10 Causeway Street
Boston, MA 02222-1072