

September 30, 2013

BY E-FILE

Farah Z. Qureshi
Associate Executive Secretary
National Labor Relations Board
1099 14th Street NW
Washington DC 20570

Re: DHSC, LLC d/b/a Affinity Medical Center
Case Nos. 8-CA-090083, et al

Dear Mr. Qureshi:

As you know, I represent DHSC, LLC d/b/a Affinity Medical Center (hereafter, “Affinity” or the “Hospital”), which is the Respondent in the above-referenced cases. As you also know, on September 29th, I e-filed a letter to your attention in which I requested reconsideration of whether Affinity’s Reply Brief to the Amended Answering Brief of the General Counsel complied with the Board’s Rules. Because I did not receive a response from your office today, and given the fact that your letter from last Thursday designated today as the deadline for the submission of a conforming Reply Brief, contemporaneously with this letter, I have e-filed an Amended Reply Brief. As you will see, aside from what is now an unnumbered cover page, the only difference between the original Reply Brief and the Amended Reply Brief is the latter omits the introductory paragraph that appeared on page 1 of the original Brief, along with the conclusion that appeared on pages 11 and 12 of the original Brief.

Even though, as explained by my September 29th letter to you, I anticipate that your office’s position on the Union’s Objection would be the very same as its position on the General Counsel’s Objection, insofar as your letter to me of September 26th designated a deadline only with respect to Affinity’s Reply Brief to the Amended Answering Brief of the General Counsel, I have not submitted an Amended Reply Brief to the Union’s Answering Brief. As to the Union’s Brief, I shall await a response from your office with respect to

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the Hospital's position, as reflected in my September 29th letter to you, that the Union's Brief does not comply with the Board's Rules.

Respectfully submitted,

/s/ _____

Bryan T. Carmody

cc: Sharlee Cendrosky, Esq., Counsel for the General Counsel, by email
Jane Lawhon, Esq., Counsel for the Charging Party, by email