UNITED STATES OF AMERICA
BEFORE THE NATIONAL LABOR RELATIONS BOARD

ANHEUSER-BUSCH, LLC

and

Case 12-CA-094114

MATTHEW C. BROWN, an Individual

and

INTERNATIONAL BROTHERHOOD OF
TEAMSTERS, LOCAL 947 AND
INTERNATIONAL BROTHERHOOD OF
TEAMSTERS, BREWERY, AND SOFT
DRINK WORKERS CONFERENCE, Parties in Interest

GENERAL COUNSEL'S CROSS-EXCEPTIONS TO THE ADMINISTRATIVE LAW JUDGE'S DECISION

Marinelly Maldonado
Counsel for the General Counsel
National Labor Relations Board
Region 12
51 SW 1st Avenue, Suite 1320
Miami, FL 33130
Telephone No. (305) 530-7034
Facsimile No. (305) 536-5320
marinelly.maldonado@nlrb.gov

Counsel for the General Counsel hereby files the following cross- exceptions to the Decision of the Administrative Law Judge (ALJ) in the matter of Anheuser-Busch, LLC, Case 12-CA-094114, reported at JD(ATL)-24-13, and issued on September 10, 2013. General Counsel's cross-exceptions and answering brief to Respondent's exceptions are being filed simultaneously with these cross-exceptions.

1. The ALJ erred by finding that the language regarding the Dispute Resolution Program in Respondent's Application for Employment form the same as the language of its Dispute Resolution Program Policy (DRP) and by failing to find the actual language regarding the DRP in the application form that has been used by Respondent at its Jacksonville, Florida brewery since 2004, and that was signed by Charging Party Matthew C. Brown. (ALJD 4:7-9).

2. The ALJ erred by failing to include a remedy and a provision in the recommended Board Order requiring Respondent to reimburse Matthew Brown for attorneys fees and costs he incurred that are related to his opposition to the unlawful portion of Respondent's motion to dismiss Brown's Title VII lawsuit and compel arbitration that is based on Respondent's DRP, and to reimburse Brown for litigation expenses related to any other legal action taken by Respondent to enforce its DRP against Brown, plus interest. The ALJ further erred by failing to

include notice of this remedy in the recommended Notice to Employees. (ALJD 10:45to12:13; ALJD Appendix).

Dated at Miami, Florida this 14th day of November, 2013.

Respectfully submitted,

/s/ Marinelly Maldonado

Marinelly Maldonado
Counsel for the General Counsel
National Labor Relations Board
Miami Resident Office, Region 12
51 S.W. 1st Avenue, Suite 1320
Miami, FL 33130
marinelly.maldonado@nlrb.gov

CERTIFICATE OF SERVICE

I hereby certify that Counsel for the General Counsel's Cross-Exceptions in the matter of Anheuser-Busch, LLC, Case 12-CA-094114, were electronically filed and served by electronic mail on November 14, 2013, as set forth below:

By Electronic Filing
Hon. Gary W. Shinners
Executive Secretary
National Labor Relations Board – Room 11602
11099 Fourteenth Street, N.W.
Washington, D.C. 20570-0001

By Electronic Mail
Thomas Royall Smith, Esq.
Jackson Lewis LLP
100 South Ashley Drive, Suite 2200
Tampa, FL 33602
Thomas.Smith@jacksonlewis.com

Jeffrey H. Klink, Esq.
2319 Oak Street
Jacksonville, FL 32204
Jhklink@gmail.com

Joseph Egan, Esq.
Egan, Lev & Siwica
PO Box 2331
Orlando, FL 32804
jegan@eganlev.com

Respectfully submitted,

/s/ Marinelly Maldonado

Marinelly Maldonado
Counsel for the General Counsel
National Labor Relations Board
Miami Resident Office, Region 12
51 S.W. 1st Avenue, Suite 1320
Miami, FL 33130
marinelly.maldonado@nlrb.gov