

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

LATINO EXPRESS, INC.

And

**13-CA-077678
13-CA-078126
13-CA-078127
13-CA-079765
13-CA-082141**

**TEAMSTERS LOCAL UNION NO. 777,
AFFILIATED WITH THE INTERNATIONAL
BROTHERHOOD OF TEAMSTERS, AFL-CIO**

**COUNSEL FOR THE GENERAL COUNSEL'S
ANSWERING BRIEF TO INTERVENORS' EXCEPTIONS
TO THE DECISION OF THE ADMINISTRATIVE LAW JUDGE¹**

Administrative Law Judge David I. Goldman² correctly held that Respondent Latino Express, Inc., violated Section 8(a)(5) of the Act when it made a unilateral change to the employees working conditions, failed and refused to bargain with the Union, and unlawfully withdrew recognition from the Union. In finding that Respondent violated the Act, the ALJ properly held that Respondent's regressive bargaining, assertion of unlawful proposals in its final offer, insistence on not bargaining over health care, unlawful unilateral implementation of the driver accountability act, and its support for the decertification petition violated

¹ Throughout this brief, the use of the term "Intervenors" is used only to assist with ease of identification and to avoid confusion. The "Intervenors" purport to be a group of employees that signed a decertification petition involving the parties, including the Petitioner in Case 13-RD-79228. However, the "Intervenors" have never been granted intervenor status and there is no evidence in the record to establish that Muggeridge in fact represents any employees outside of the Petitioner in the decertification petition and two additional employees.

² Throughout this Answering Brief, the Administrative Law Judge will be referred to as "ALJ," the National Labor Relations Board will be referred to as the "Board," and the National Labor Relations Act will be referred to as the "Act." The Administrative Law Judge's Decision will be referred to as "ALJD __." References to Respondent's Exceptions will be referenced as "Exceptions __." With respect to the parties in this case, Teamsters Local Union No. 777, Affiliated with the International Brotherhood of Teamsters, AFL-CIO will be referred to as "the Union" or "Local 777" and Latino Express, Inc., will be referred to as "Respondent" or "the Employer".

Section 8(a)(5) of the Act. (ALJD 18-19) Thus, Respondent clearly demonstrated a consistent disregard for the drivers' bargaining representative.

Based upon the coercive nature of these unfair labor practices which traditional remedies cannot erase, under *Lee Lumber & Building Material Corp. v. NLRB*, 117 F.3d 1454, 1462 (D.C. Cir. 2000), the ALJ properly granted the extraordinary remedy of ordering Respondent to bargain in good faith with the Union for at least six months. (ALJD 28)

The Intervenors have filed numerous exceptions to the factual findings and credibility determinations of the ALJ. The ALJ's decision explains in exacting detail the facts and reasoning supporting his decision that the Respondent violated the Act. Nothing contained within the Intervenors' exceptions detracts from his factual findings, conclusions or legal analysis. Moreover, certain exceptions, made by the Intervenors are an improper attempt to reargue the Board's denial of the Intervenors' efforts to quash a subpoena, comply with a sequestration order, and become a valid intervenor at the unfair labor practice hearing. Counsel for the General Counsel posits that the Intervenors have failed in their exceptions to show that any of the ALJ's findings are incorrect and necessitate overturning the ALJD.

I. The Intervenors' Argument that the ALJ Erred When he Denied the Intervenors' Motion to Intervene is Without Merit. (Exception 1)

Attorney Matthew C. Muggeridge purports to represent a group of employees that signed a decertification petition involving the parties, including the Petitioner in Case 13-RD-79228.³ At the commencement of the unfair labor hearing in these matters, Attorney Muggeridge motioned to intervene on behalf of the Petitioner and employees who purportedly signed the decertification petition. On October 9, 2012, the ALJ made the appropriate determination that

³ Note that Case 13-RD-79228, a decertification petition filed on April 19, 2012, by Ramiro Lopez against Teamsters 777 covering the unit represented at Respondent, has been administratively blocked by Region 13, and has **not** been consolidated with the instant case for trial.

the Intervenor's Motion to Intervene should be denied. After the Motion was denied, the Intervenor filed a Request for Special Appeal with the Board. The Board reviewed the appeal and upheld the ALJ's ruling. As an initial matter, Counsel for the General Counsel notes that all issues regarding this Motion have been reviewed by the board. In its Exception, the Intervenor failed to introduce any new facts or cite to any case authority that was not presented to the Board during the Special Appeal. Instead, they present an almost verbatim recitation of case law, facts, and arguments that were already submitted to the Board in the Special Appeal. Although the Intervenor's case authority highlights the fact that the Board has previously granted intervenor status to employees, they failed to provide any case authority that wasn't previously presented for the position that the ALJ and Board **must** grant all Motions to Intervene, a position that the Board has previously considered and rejected. The Board has consistently held that the issue of intervention is subject to the discretion of the judge and will not be disturbed absent abuse or prejudice. *Auto Workers v. NLRB*, 392 F.2d 801, 809 (D.C. Cir. 1967), cert. denied 392 U.S. 906 (1968); and *Biles-Coleman Lumber Co.*, 4 NLRB 679, 682 (1937). The Board has previously considered the exhaustive list of cases presented by the Intervenor in support of its motion, and did not find them persuasive. They are no more persuasive now than when the motion was denied by the Board.

Additionally, in all of the cases cited by the Intervenor, the Board only granted intervenor status after concluding that the intended intervenors had information that would aid the ALJ in making a final determination regarding the merits of the case. But here, despite all of Muggeridge's assertions, the purported Intervenor had nothing to add to the resolution of the Section 8(a)(5) allegation. At most, they could only testify to the circumstances in which the petition was circulated and to the authenticity of the signatures, which they were allowed to do

and that testimony was discredited by the ALJ. Even if the ALJ had credited the testimony of the petition solicitors and found that the signatures were gathered off the premises, completely without coercion, and contained an authentic majority of employee signatures the final determination of the unlawful withdrawal would not change in any material way. The petition would still be invalid under *Chelsea Industries*, the withdrawal of recognition would still be unlawful. *Chelsea Industries*, 331 NLRB at 1648 (proof of loss of majority support justifying withdrawal of recognition may not be demonstrated “after expiration of the certification year . . . on the basis of an antiunion petition circulated and presented to the employer during the certification year.”); *United Supermarkets*, 287 NLRB at 120 , (the Board held that just as a decertification petition filed with the Board during a certification year cannot provide a basis for a decertification election, an employer cannot not rely on a decertification petition filed prior to the end of the certification year to justify its withdrawal of recognition).

Alternatively, even if the Intervenors succeeded in convincing the Board in overturning *Chelsea Industries*, Respondent’s withdrawal of recognition would still be unlawful because of the pervasive atmosphere of unfair labor practices found by the ALJ. These unfair labor practices, including several unilateral changes, undermined the Union in their attempts to represent them, and thus tainted the decertification petition. Thus, Respondent was not entitled to rely on the petition to withdraw recognition in any event.

Thus, the Intervenors’ have made no showing that the ALJ’s denial of their motion was an abuse of discretion or that they had anything additional to add in the resolution of the unfair labor violations, and all attempts to improperly reargue the Board’s previous findings are inappropriate and should be ignored.

In Exception 1, the Intervenors also make the baseless proposition that the Board's representational procedures interfere with employees' free choice, which makes the denial of intervenor status an inappropriate ruling by the ALJ and Board. As stated plainly by the ALJ in his ruling on the record, and the Board in its November 27, 2012, Order, this is an unfair labor practice proceeding, not a representation case. The employees' level of disaffection with the Union is irrelevant to the unfair labor practice proceeding and the underlying issue of whether Respondent engaged in bad faith bargaining and/or illegally withdrew recognition from the Union. "What is not at issue directly in this proceeding is whether or not the employees subjectively want a Union. ... We will not be receiving testimony from any side from employees saying why they do want a Union or why they do not want a Union. ... The employees' interest in having or not having a Union is available to be vindicated and it's vindicated through the Board's representation procedure." (*See* October 9, 2012 Order, Transcript pp. 55-56). The Board agreed with the ALJ and stated that the ruling was fully in compliance with Board procedures. (*See* November 27, 2012 Order)

Despite the protestations of the Intervenors, the General Counsel's decision to oppose the Motion to Intervene was not taken lightly. The employees' thoughts and feelings regarding the Union, however strong, simply had no place in the unfair labor practice hearing and had no bearing as to whether Respondent violated Section 8(a)(5) of the Act. As stated by the ALJ, "Employee sentiment – from procedure or law or precedent, cannot determine in this unfair labor practice hearing in which company misconduct is alleged, whether the selection of Union representations [sic] that these employees chose needs to continue for a finite additional period before the employees can once again exercise their desires, and if it is their desire to at that point remove the Union as bargaining representative." (*See* Transcript, p. 59). Counsel for the

General Counsel's Opposition to the Motion, and the ALJ's Ruling and Board's Order that the Motion should be denied, were the result of well a reasoned application of case authority and Board procedures. Consequently, the Intervenors' aspersions upon the General Counsel's motives should be completely disregarded.

In Exception 1, the Intervenors also contend that intervenor status was necessary to protect their interest and clarify the "significant contradictions" in their testimony at the hearing. As an initial matter, Muggeridge was allowed to be present and fully represent the three employees that solicited signatures in support of the decertification petition. If Muggeridge wanted to clarify the contradictions in their testimony, he was free to do so during his examination of those witnesses at trial. But the main problem with this argument the ALJ credited other witnesses instead of them, implicitly finding them not to be credible witnesses. However, the Intervenors provides no argument for why the Board should reverse the ALJ's credibility finding, and in any event, there is no basis for reversing this finding. Therefore, the Board should disregard the Intervenors' hollow exception.

The Intervenors also make the unsubstantiated argument that they were prejudiced because they were not allowed to assist with the Employer's defense of the unfair labor practice case. The Intervenors and non-party participants are not responsible for defending allegations against an employer charged with violating the Act. Respondent was represented in these matters by experienced counsel, and there is no necessity that intervenor status be granted to ensure that Respondent retained competent counsel or adequately protect its interest at trial. As for protecting his "clients" interest, the ALJ allowed Muggeridge's presence during all procedural motions and the testimony of his clients. As stated in the October 22 Order, if Muggeridge truly wanted to protect the interest of the people he purports to represent, he could

have merely advised them to seek legal representation from someone that was not required to give testimony at the unfair labor practice hearing. (*See* October 22, 2012 Order) The fact that Muggeridge chose not to take that course does not validate his Motion to Intervene.

Despite the protestations of the Intervenors, as explained above, they were not entitled to intervene in the instant matter and their exception should be denied in its entirety.

II. Issuing and Enforcing The Subpoena Ad Testificandum As To Muggeridge Was Appropriate (Exception 2)

On September 24, 2012, Counsel for the Acting General Counsel issued a Board subpoena directing Attorney Muggeridge to appear to testify at the administrative hearing in this matter. On October 1, 2012, Attorney Muggeridge filed a petition to revoke the subpoena. On October 3, 2012, Counsel for the General Counsel filed a response in opposition to the petition to revoke the subpoena, and Attorney Muggeridge filed a reply to General Counsel's response in opposition. In his petition to revoke, Attorney Muggeridge objected to the subpoena on the asserted grounds that "testimony sought will clearly be protected from disclosure under the attorney-client or work-product privileges."

The ALJ reviewed the parties' filings and properly determined that there were no valid grounds to revoke the subpoena, because it was impossible to predict that the Acting General Counsel would seek to elicit objectionable/privileged testimony. In response to ALJ Goldman's failing to revoke the subpoena, Attorney Muggeridge filed a Request for a Special Appeal with the Board. In the request, Muggeridge continued to assert, as he did in his original Petition to Revoke Subpoena, that he should not be compelled to testify on the grounds that anything he may be called upon to testify about will necessarily encompass the legal representation he has provided to the Petitioner, and must therefore be considered work product or attorney-client privileged. Counsel for the General Counsel reiterated its position that work product and

attorney-client privilege do not apply to the facts about which the General Counsel intended to question Muggeridge in the unfair labor practice trial, and the Board refused to revoke the subpoena.

Muggeridge has abandoned his ineffective argument regarding the necessity of revocation⁴. Instead, he now makes the specious implication that General Counsel only issued the subpoena in an effort to impair the Intervenors' representation at trial. Muggeridge fails to give any explanation for the basis of this unfounded contention. It can only be assumed that the failure to provide any legal or factual support that would mandate the Board overturning the ALJ's and its own previous ruling means that such support does not exist. Counsel for the General Counsel's subpoena was issued for no other reason than to make sure that the record was complete and that the public interest that General Counsel is entrusted with enforcing was adequately fulfilled. Again, if Muggeridge had wanted to ensure that his clients' interests were vindicated beyond the suitable measures granted by the ALJ, he could have simply advised that they seek alternative representation, and not make unsubstantiated claims against the General Counsel. Based on the foregoing, Exception 2 should be denied in its entirety.

III. The ALJ's Sequestration Order Appropriately Balanced Muggeridge's Role As Petitioner's Attorney and Muggeridge's Role As Material Witness (Exception 3)

In support of Exception 3, Muggeridge merely incorporates his arguments in support of Exceptions 1 and 2. Counsel for the General Counsel incorporates the arguments made in support of its response to Exceptions 1 and 2 into the response to Exception 3.

⁴ Muggeridge acknowledges that the subpoena was voluntarily dismissed which means this issue is moot and is an unnecessary use of Board processes and time.

As for the specific subject matter raised in Exception 3, in his Special Appeal, Muggeridge also attempted to argue that the ALJ's sequestration order would not allow him to fully represent himself or his client. His attempts were unsuccessful. The subject matter of Exception 3 simply reiterates his position regarding the sequestration order. Muggeridge is once again improperly attempting to reargue issues that have been decided by the Board, and this improper attempt to rehash previously decided motions should be denied.

Even if Muggeridge's attempt to reargue his special request was appropriate, the ALJ's October 22, 2013 Order makes Muggeridge's arguments moot. The ALJ struck a balance between Muggeridge's role as counsel to a non-party and his role as a subpoenaed witness which permitted him to function fully as the attorney to Petitioner and other non-party employees, but not expose him to testimony of non-clients. As per the ALJ's October 22 Order, Muggeridge was allowed to review and copy the portions of the transcript that directly related to Muggeridge's appeals and for all portions of the hearing he was permitted to attend - those portions of the transcript that concern: the motion to intervene; the petition to revoke the subpoena directing his testimony; his refusal to testify; the testimony of witnesses whom Muggeridge represented at the time the testimony was provided; and all portions of the transcript recording the hearing prior to the entry of the sequestration order, up to and including the colloquy over and discussion of the sequestration order. (*See* October 22, 2012 Order).

By striking such a balance, Muggeridge was able to act as counsel for his non-party clients and advocate for himself, while still complying within the strictures of the sequestration order issued to all witnesses in an unfair labor practice proceeding. Such a modified sequestration order more than quelled any apprehensions raised by Muggeridge throughout his Special Appeal and Exception 3.

IV. The ALJ's Findings that Respondent Unlawfully Withdrew Recognition from the Union Because the Petition Was Tainted by Bad Faith Bargaining, Prematurity and Lack of Majority Support were Correct and Should be Upheld (Exception 4)

In support of Exception 4, Muggeridge incorporates his arguments in support of Exceptions 1 and 2. Counsel for the General Counsel incorporates the arguments made in support of its response to Exceptions 1 and 2 into the response to Exception 4.

As for the specific subject matter raised in Exception 4, the claims put forth in Intervenors' Exception 4 are a series of claims that the ALJ made various findings in error. The Exception does not specify the record relied upon in support of the exception, concisely state the grounds for the exception, or set forth the questions of procedure, fact, law or policy to which exception is taken. These blanket assertions, without the requisite supporting argument, hinders the General Counsel's ability to fully address and/or respond to Intervenors' Exception 4. Intervenors' deficient filing undoubtedly failed to show that any of the ALJ's findings are incorrect and necessitate overturning the ALJD. Accordingly, Counsel for the General Counsel requests that this exception be ignored for failing to comply with Section 102.46(c) of the Board's Rules and Regulations.

Assuming, *arguendo*, that the Board does not strike this exception, the lack of citation to record evidence in these exceptions can only mean one of two things, either of which is fatal to the Intervenors' exception: either the Intervenors are asserting facts that are not in the record, or the Intervenors are basing its arguments on facts that were not credited by the ALJ. If the Intervenors are asserting facts that are not in the record, it has not made any motion to reopen the record to introduce any evidence to support such assertions. In any event, it has not made any showing required under Section 102.48(d)(1) of the Board's Rules and Regulations that there are

any extraordinary circumstances that would justify reopening the record to introduce such evidence.

On the other hand, if the Intervenors' assertions are meant to attack the ALJ's credibility determinations, they have provided no argument demonstrating why such determinations should be overturned. As such, they have failed to provide any basis for disturbing the findings of fact the ALJ relied on. In either case, whether the Intervenors are asserting new facts or silently challenging the ALJ's credibility findings, their exception do not support any alternative findings of fact. As *Standard Dry Wall Products*, supra, states, the Board does not overrule credibility determinations except where the clear preponderance of *all* the relevant evidence convinces the Board that the administrative law judge's resolutions were incorrect. *Id.* At 544. Although the Intervenors are dissatisfied with many of the ALJ's credibility determinations, they have failed to support such dissatisfaction with actual evidence of bias or other recognized basis for establishing that the ALJ's credibility determinations run contrary to the "clear preponderance of all the relevant evidence". Accordingly, because the Intervenors have clearly not met their burden all credibility determinations of the ALJ should properly be sustained and Exception 4 should be overruled.

V. The Board's holding in *Chelsea Industries*, 331 NLRB 1648 (2000), *enfd.* 285 F.3d 1073 (D.C. Cir. 2002), Should Not be Overturned (Exception 5, 7-8)

Intervenors' Exception 5 and 7-8 reduces to an argument that the Board should overrule the doctrine announced in *Chelsea Industries*, 331 NLRB 1648 (2000). In that case, the Board held that an employer may not withdraw recognition from a union outside of the certification year based upon evidence received within the certification year. See also *United Supermarkets*, 287 NLRB 119 (1987) *enfd.* 862 F.2d 549 (5th Cir. 1989). It is improper for an employer to rely on an anti-union petition that was circulated to employees prior to the expiration of the

certification year in order to justify an otherwise timely withdrawal of recognition. *Chelsea Industries*, 331 NLRB at 1648 (proof of loss of majority support justifying withdrawal of recognition may not be demonstrated “after expiration of the certification year . . . on the basis of an antiunion petition circulated and presented to the employer during the certification year.”); *United Supermarkets*, 287 NLRB at 120 , (the Board held that just as a decertification petition filed with the Board during a certification year cannot provide a basis for a decertification election, an employer cannot not rely on a decertification petition filed prior to the end of the certification year to justify its withdrawal of recognition).

Outside of a self serving statement that the Intervenors do not agree with the law in *Chelsea*, the Intervenors cite to no case authority that would necessitate the Board reexamining its holdings. Nor do they address the well-founded policy reasons that led to the Board’s adopting the rule of *Chelsea Industries*. Accordingly, given that Respondent failed to authenticate the signatures on the decertification petition and had knowledge that the signatures were acquired prior to the end of the certification year; Respondent’s withdrawal of recognition was unlawful pursuant to *Chelsea Industries* and the Intervenors’ exceptions are without merit. (ALJD 23)

VI. The ALJ Correctly Held that the Decertification Petition Could Not be Relied Upon Because the Respondent Failed to Meet its Burden Regarding the Authenticity of the Signatures (Exception 6 and 9)

Yet again, in support of Exceptions 6 and 9, Muggeridge merely incorporates his arguments in support of Exceptions 1 and 2. Counsel for the General Counsel incorporates the arguments made in support of its response to Exceptions 1 and 2 into the response to Exceptions 6 and 9.

As for the specific subject matters raised in Exception 9, the Intervenors' failed to specify the record relied upon in support of these exceptions, concisely state the grounds for the exceptions, or set forth the questions of procedure, fact, law or policy to which exception is taken. Accordingly, Counsel for the General Counsel requests that Exceptions 6 and 9 filed by the Intervenors be ignored for failing to comply with Section 102.46(c) of the Board's Rules and Regulations. Assuming, *arguendo*, that the Board does not strike these exceptions, the lack of citation to record evidence in these exceptions can only mean that the Intervenors are asserting facts that are not in the record, or the Intervenors are basing its arguments on facts that were not credited by the ALJ. If the Intervenors are asserting facts that are not in the record, they have not made any motion to reopen the record to introduce any evidence to support such assertions. In any event, they have not made any showing required under Section 102.48(d)(1) of the Board's Rules and Regulations that there are any extraordinary circumstances that would justify reopening the record to introduce such evidence.

In contrast to the Intervenors' baseless assertions, the ALJ's finding that Respondent's withdrawal of recognition was unlawful is fully supported by the record evidence and controlling case authority. There is no evidence contained in the record that Respondent made any attempt to authenticate the petition prior to illegally withdrawing recognition. The Board requires employers to properly authenticate signatures on a decertification petition sufficient to demonstrate that a union has lost majority support. *Ambassador Services*, 358 NLRB No. 130 slip op. at 11 (January 31, 2012). The ALJD properly held that Latino Express failed to carry this burden at the hearing, authenticating, at most, only 23 of the possible 84 employee signatures. (ALJD 24) The Intervenors failed to present any citation to the record to support its position and all such claims should be disregarded.

Finally, the Intervenors contend that the ALJ erred in finding that *Chelsea Industries*, 331 NLRB 1648 (2000), *enfd.* 285 F.3d 1073 (D.C. Cir. 2002), requires the signatures on a decertification petition be collected after the conclusion of the certification year. The Intervenors do not refer to any specific language within *Chelsea* for the basis of its claim. In *Chelsea Industries*, 331 NLRB 1648 (2000), the Board clearly stated that an employer may not withdraw recognition from a union outside of the certification year based upon evidence received within the certification year. See also *United Supermarkets*, 287 NLRB 119 (1987). It is improper for an employer to rely on an anti-union petition that was circulated to employees prior to the expiration of the certification year in order to justify an otherwise timely withdrawal of recognition. *Chelsea Industries*, 331 NLRB 1648 (2000), *enfd.* 285 F.3d 1073 (D.C. Cir. 2002) (proof of loss of majority support justifying withdrawal of recognition may not be demonstrated “after expiration of the certification year . . . on the basis of an antiunion petition circulated and presented to the employer during the certification year.”); *United Supermarkets*, 287 NLRB 119, 120 (1987), *enfd.* 862 F.2d 549 (5th Cir. 1989) (the Board held that just as a decertification petition filed with the Board during a certification year cannot provide a basis for a decertification election, an employer cannot not rely on a decertification petition filed prior to the end of the certification year to justify its withdrawal of recognition).

Accordingly, given that Respondent failed to authenticate the signatures on the decertification petition and had knowledge that the signatures were acquired prior to the end of the certification year; Respondent’s withdrawal of recognition was unlawful pursuant to *Chelsea Industries* and the ALJ did not err when he made his findings. (ALJD 23)

VII. The Bargaining Order and Remedy Imposed by the ALJ are Appropriate and Should be Upheld (Exception 10)

As argued above by Counsel for the General Counsel, there is absolutely no support for any of the Exceptions filed by the Intervenors, including its general exceptions to the ALJ's conclusions of law and order. While certainly imaginative, the Intervenors' Exceptions to the ALJ's Decision do not alter the substantial record evidence demonstrating that Respondent violated Section 8(a)(5) of the Act. Moreover, certain exceptions are based on grossly mischaracterized testimony or evidence that was not contained in the record at all, and seek to challenge credibility resolutions which should not be disturbed. Accordingly, the Board should deny the Intervenors' exceptions in their entirety.

CONCLUSION

Based upon the foregoing, the entire record in this case, and the Decision of Administrative Law Judge Goldman, Counsel for the General Counsel submits that the Intervenors' Exceptions to the Administrative Law Judge's Decision fail to comply with Section 102.46 (c), reargue previously denied motions and are wholly without merit. Counsel for the General Counsel respectfully requests therefore, that the Intervenors' Exceptions be dismissed in their entirety and Judge Goldman's recommended Decision, Order and Remedy be affirmed.

DATED at Chicago, Illinois, this 23rd day of December, 2013.

/s/ Sylvia L. Taylor

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing **COUNSEL FOR THE ACTING GENERAL COUNSEL'S ANSWERING BRIEF TO INTERVENORS' EXCEPTIONS AND BRIEF IN SUPPORT OF EXCEPTIONS** was electronically filed with the Executive Secretary of the National Labor Relations Board on May 20, 2013, and true and correct copies of the document have been served on the parties in the manner indicated below on that same date.

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