

**UNITED STATES OF AMERICA
BEFORE THE NATIONAL LABOR RELATIONS BOARD
REGION 28**

EXPOSITION STORAGE SERVICES, LLC,

Case No. 28-RC-109730

Employer,

and

**TEAMSTERS, CHAUFFEURS, WAREHOUSEMEN
AND HELPERS, LOCAL UNION NO. 631
affiliated with INTERNATIONAL BROTHERHOOD
OF TEAMSTERS,**

Petitioner.

**EXCEPTIONS TO THE HEARING OFFICER'S REPORT AND
RECOMMENDATIONS ON THE CHALLENGED BALLOTS**

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**EXCEPTIONS TO THE HEARING OFFICER'S REPORT AND
RECOMMENDATIONS ON THE CHALLENGED BALLOTS**

Exposition Storage Services, LLC (hereinafter "Employer"), by and through its counsel, the law firm of Kamer Zucker Abbott, hereby files exceptions to the Report and Recommendations on the Challenged Ballots of the Hearing Officer in the following particulars:

1. To the Hearing Officer's finding that the parties did not reach agreement prior to the election on the specific individuals allowed to vote. (Decision at 6).
2. To the Hearing Officer's finding that the challenged voters were not seasonal employees. (Decision at 9, 14).
3. To the Hearing Officer's finding that the Employer is not dependent on any claimed seasonal labor. (Decision at 9).
4. To the Hearing Officer's finding that the Employer did not rehire a substantial number of employees each season. (Decision at 9).
5. To the Hearing Officer's finding that the Employer did not have a recall list. (Decision at 10).
6. To the Hearing Officer's credibility determination regarding General Manager Robert Breedlove. (Decision at 10).
7. To the Hearing Officer's finding that the challenged voters did not have a reasonable expectation of reemployment. (Decision at 13).
8. To the Hearing Officer's finding that the challenged voters were not casual employees. (Decision at 14).

DATED this 10th day of January, 2014.

Respectfully submitted,

KAMER ZUCKER ABBOTT

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