

UNITED STATES OF AMERICA  
BEFORE THE NATIONAL LABOR RELATIONS BOARD

BWI TAXI MANAGEMENT, INC.

Employer

and

Case No. 5-RC-16489

EVENING SHIFT CAB OPERATORS  
ASSOCIATION

Petitioner

**EVENING SHIFT CAB OPERATORS ASSOCIATION**  
**STATEMENT IN OPPOSITION TO REQUEST FOR REVIEW**

Evening Shift Cab Operator's Association (herein "ESCOA") submits this Statement in Opposition to BWI Taxi Management, Inc.'s (herein "BTM") Request for Review of the Regional Director's Decision and Direction of Election dated September 16, 2010. BTM has filed this Request claiming that the Regional Director's Decision was erroneous on the record and raises substantial questions of law because the Decision is inconsistent with Board Precedent.

ESCOA respectfully submits that the Decision of the Regional Director is clearly supported by the factual record and that his Decision is in keeping with Board's precedent under *Roadway Package System*, 326 NLRB 842 (1998) as well as *Friendly Cab Company*, 341 NLRB 722 (2004). Given the reasons stated herein as well as those enunciated in the ESCOA's closing argument contained in the

record, Petitioner requests that the Board deny the Request for Review.



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