

**UNITED STATES OF AMERICA
NATIONAL LABOR RELATIONS BOARD
REGION TWELVE**

**LAKELAND HEALTH CARE ASSOCIATES, LLC,)
D/B/A WEDGEWOOD HEALTHCARE CENTER)
Respondent,)
AND)
UNITED FOOD & COMMERCIAL WORKERS)
UNION, LOCAL 1625,)
Petitioner.)**

CASE 12-CA-27044

**RESPONDENT’S RESPONSE TO MOTION FOR SUMMARY JUDGMENT
AND SHOW CAUSE ORDER**

Respondent Lakeland Health Care Associates, LLC, d/b/a Wedgewood Healthcare Center (“Respondent”), through undersigned counsel responds to the Motion for Summary Judgment and Show Cause Order as follows.

As set forth in Respondent’s Answer to the Complaint, the Certification of Representative issued by the Board is invalid because it includes supervisors as defined under Section 2(11) of the Act. Respondent further incorporates by this reference, as though fully set forth herein, all argument contained within Respondent’s Request for Review, attached as Exhibit B to the Motion for Summary Judgment. For these reasons, Respondent respectfully requests that the Acting General Counsel’s Motion for Summary Judgment be denied.

Respectfully submitted,

LITTLER MENDELSON, P.C.

By: /sChristine S. Tenley
Christine S. Tenley
Gregory S. Richters
Attorneys for the Employer

Gregory S. Richters
Christine S. Tenley
LITTLER MENDELSON, P.C.
3344 Peachtree Road N.E.
Suite 1500
Atlanta, Georgia 30326-4803
Telephone: 404.233.0330
E-mail: grichters@littler.com
E-mail: ctenley@littler.com

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this 6th day of April 2011, the foregoing was filed electronically upon the following:

Hon. Lester Heltzer
Executive Secretary
National Labor Relations Board
1099 14th Street, N.W.
Washington, DC 20570-001

The undersigned also hereby certifies that on this 6th day of April 2011, a copy of the foregoing was served electronically upon the following,.

Glenn W. Harris
Director of Organizing
United Food and Commercial Workers
Union, Local 1625
705 E. Orange Street
Lakeland, FL 33801
ufcw1625@aol.com

Kathleen M. Troy
Counsel for the Acting General Counsel
National Labor Relations Board, Region 12
201 East Kennedy Boulevard
Suite 530
Tampa, FL 33602
ktroy@nlrb.gov

/s Christine S. Tenley
Christine S. Tenley

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