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6 Attorneys for the Petitioner, MACHINISTS DISTRICT LODGE 190,  
MACHINISTS LOCAL LODGE NO. 1414,  
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9 UNITED STATES OF AMERICA  
10 NATIONAL LABOR RELATIONS BOARD  
11 REGION 20

12 MACHINISTS DISTRICT LODGE 190,  
MACHINISTS LOCAL LODGE NO. 1414,

No. 20-RC-86155

13  
14 Petitioner,

**RESPONSE TO EXCEPTIONS**

15 and

16 CERVERA AUTOMOTIVE GROUP LLC  
D/B/A VERACOM FORD,

17 Employer.  
18

19 Petitioner responds to the silly exceptions filed by Saford Rudnick, Labor Consultant.

20 As is reflected in the Report on Challenged Ballots. An employer's Objections to  
21 Conduct of Election, the Regional Director opened the ballots of two individuals whose ballots  
22 were challenged. Because both of them, voted for the Union, their votes could not have affected  
23 the outcome of the election. Only if they both voted against the Union could potentially the  
24 challenged ballots including those have affected the outcome. Because those votes did not affect  
25 the outcome of the election, the Regional Director recommended the issuance of a Certification  
26 of Representation.

27 Additionally, the employer through its labor consultant failed to offer any evidence in  
28 support of its objections to the conduct of the election. Those objections were therefore rejected.



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**PROOF OF SERVICE  
(CCP §1013)**

I am a citizen of the United States and resident of the State of California. I am employed in the County of Alameda, State of California, in the office of a member of the bar of this Court, at whose direction the service was made. I am over the age of eighteen years and not a party to the within action.

On November 13, 2012, I served the following documents in the manner described below:

**RESPONSE TO EXCEPTIONS**

- (BY ELECTRONIC SERVICE) By electronically mailing a true and correct copy through Weinberg, Roger & Rosenfeld's electronic mail system from kshaw@unioncounsel.net to the email addresses set forth below.

On the following part(ies) in this action:

Mr. Sanford Rudnick  
H. Sanford Rudnick & Associates  
1200 Mt. Diablo Blvd., Suite 300  
Walnut Creek, CA 94596  
(925) 256-0980 (fax)

Mr. Joseph F. Frankl  
NLRB, Region 20  
Regional Director  
901 Market Street, Suite 400  
San Francisco, CA 94103  
(415) 356-5156 Fax

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on November 13, 2012, at Alameda, California.

/s/ Katrina Shaw  
\_\_\_\_\_  
Katrina Shaw