

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

NEXEO SOLUTIONS, LLC,	:	
	:	
Respondent,	:	
	:	Cases 13-CA-46694
and	:	13-CA-62072
	:	20-CA-35519
TRUCK DRIVERS, OIL DRIVERS, FILLING	:	
STATION AND PLATFORM WORKERS'	:	
UNION, LOCAL NO. 705, AN AFFILIATE OF	:	
THE INTERNATIONAL BROTHERHOOD OF	:	
TEAMSTERS,	:	
	:	
and	:	
	:	
BROTHERHOOD OF TEAMSTERS AND	:	
AUTO TRUCK DRIVERS, LOCAL NO. 70	:	
OF ALAMEDA COUNTY, AFFILIATED WITH	:	
THE INTERNATIONAL BROTHERHOOD OF	:	
TEAMSTERS	:	
	:	
	:	
Charging Parties.	:	

**RESPONDENT NEXEO SOLUTIONS, LLC'S REPLY BRIEF
TO LOCAL 705'S ANSWERING BRIEF**

David A. Kadela
Littler Mendelson, P.C.
21 East State Street, Suite 1600
Columbus, Ohio 43215
Telephone: 614.463.4201
Facsimile: 614.221.3301
Email: dkadela@littler.com

*Attorney for Respondent
Nexo Solutions, LLC*

Dated: December 13, 2012

As its reply to Local 705's answering brief to the Company's exceptions to the ALJ's decision and recommended order, Nexeo incorporates herein the arguments it makes in its reply brief to the Acting General Counsel's answering brief. For the reasons stated in that brief, as well as those set forth in its exceptions and its brief in support of its exceptions, Nexeo respectfully requests that the Board reverse each finding the ALJ made that the Company violated the Act, and issue an order dismissing the complaints in these cases in their entirety.

Respectfully submitted,



David A. Kadela
Little Mendelson, P.C.
21 East State Street, Suite 1600
Columbus, Ohio 43215
Telephone: 614.463.4201
Facsimile: 614.221.3301
Email: dkadela@littler.com

*Attorney for Respondent
Nexeo Solutions, LLC*

CERTIFICATE OF SERVICE

I hereby certify that on this 13th day of December 2012, I served the foregoing Brief upon the following via email:

J. Edward Castillo, Esq.
National Labor Relations Board – Region 13
209 South Lasalle Street, Suite 900
Chicago, Illinois 60604
Counsel for the General Counsel

and

Richard McPalmer, Esq.
National Labor Relations Board, Region 20
901 Market Street, Suite 400
San Francisco, CA 94103
Counsel for the General Counsel

Thomas D. Allison, Esq.
N. Elizabeth Reynolds, Esq.
Allison, Slutsky & Kennedy, P.C.
230 West Monroe Street, Suite 2600
Chicago, Illinois 60606
Attorney for Charging Party IBT Local 705

and

David A. Rosenfeld, Esq.
Weinberg, Roger & Rosenfeld, P.C.
1001 Marina VLG Parkway, Suite 200
Alameda, CA 94501-6430
Attorney for IBT Local 70



David A. Kadela