

**UNITED STATES OF AMERICA
BEFORE THE NATIONAL LABOR RELATIONS BOARD
REGION 32**

**HENRY RODRIGUEZ, SR., HENRY RODRIGUEZ, JR.,
MONICA PRITCHETT, and CHRISTOPHER PRITCHETT,
a CALIFORNIA GENERAL PARTNERSHIP, d/b/a
LIFE'S CONNECTIONS**

and

Case 32-CA-068654

CHRIS MORA, an Individual

and

**HENRY RODRIGUEZ, SR., HENRY RODRIGUEZ, JR.,
MONICA PRITCHETT, and CHRISTOPHER PRITCHETT,
a CALIFORNIA GENERAL PARTNERSHIP, d/b/a
LIFE'S CONNECTIONS**

and

Case 32-CA-068656

CONSTANCE SIFTON, an Individual

**MOTION TO TRANSFER AND CONTINUE CASE BEFORE THE BOARD
AND MOTION FOR DEFAULT JUDGMENT**

The Acting General Counsel for the National Labor Relations Board (the Board), by the undersigned Counsel for the Acting General Counsel, pursuant to Section 102.20, 102.24, 102.50, 102.54, 102.56 and 102.59 of the Board's Rules and Regulations, Series 8, as amended, hereby moves that the proceedings in the above-captioned cases be transferred to the Board for a final determination on the basis of the pleadings previously filed. Attached to this Motion as exhibits, and incorporated herein by reference, are copies of the Compliance Specification and Notice of Hearing, and other relevant documents described below.

Counsel for the Acting General Counsel further moves that, upon transfer of proceedings to the Board, the Board issue an appropriate order to show cause why this motion should not be granted, and that unless Henry Rodriguez, Sr., Henry Rodriguez, Jr., Monica Pritchett, and Christopher Pritchett, a California General Partnership, d/b/a Life's Connections (collectively called Respondent and individually called the Four Partners) shows good cause for failing to file an answer within the time specified by Sections 102.20 and 102.56 of the Board's Rules and Regulations, all the allegations contained in the Compliance Specification and Notice of Hearing be deemed to be admitted to be true and an order entered providing for an appropriate remedy, without the holding of a hearing or without taking evidence in support of the allegations in the Compliance Specification and Notice of Hearing.

In support of this Motion, Counsel for the Acting General Counsel offers the following:

1.

On September 18, 2012, the Board issued its Decision and Order, 358 NLRB No. 139, directing Respondent to take certain affirmative action, including, *inter alia*, offering Chris Mora and Constance Sifton full reinstatement and making Mora and Sifton whole for losses they suffered as a result of Respondent's unlawful termination of Mora in violation of Section 8(a)(1) of the Act and Respondent's unlawful termination of Sifton in violation of Sections 8(a)(1) and 8(a)(3) of the Act. A copy of the Board's Decision and Order is attached hereto as *GC Exhibit 1*.

2.

On November 6, 2012, the United States Court of Appeals for the Ninth Circuit entered its Judgment, enforcing the underlying Board Order. A copy of the Ninth Circuit's Judgment is attached hereto as *GC Exhibit 2*.

3.

On December 19, 2012, the Regional Director for the Thirty-Second Region of the Board, (the Regional Director), pursuant to the authority duly conferred upon him by the Board, issued a Compliance Specification and Notice of Hearing ("Compliance Specification") in these cases. A copy of the Compliance Specification is attached hereto as *GC Exhibit 3*.

4.

Respondent and each of the Four Partners individually were served with and received a copy of the aforesaid Compliance Specification at both their business and home addresses by United Parcel Service ("UPS") Overnight Service, as evidenced by the Affidavit of Service and the tracking printouts from the United States Postal Service and UPS. (Copies of which are attached as *GC Exhibits 4, and 5 (a), (b), (c), (d), (e), (f), (g), (h), (i), (j), (k) and (l)*). More specifically, partner Henry Rodriguez, Sr. was served by UPS Overnight and by certified mail, return receipt requested at Respondent's current business address of 6010 Hellyer Avenue, San Jose, CA 95138, and was served by UPS Overnight at Rodriguez, Sr.'s current residential address of 320 Lassenpark Circle, San Jose, CA 95136. *GC Exhibits 5(a), (b) and (c)*. Partner Henry Rodriguez, Jr. was served by UPS Overnight and by certified mail, return receipt requested at Respondent's current

business address of 6010 Hellyer Avenue, San Jose, CA, 95138 and was served by UPS Overnight at Rodriguez, Jr.'s current residential address of 320 Lassenpark Circle, San Jose, CA 95136. *GC Exhibits 5(d), (e) and (f)*. Partner Monica Pritchett was served by UPS Overnight at Respondent's business address of 6010 Hellyer Avenue, San Jose, CA 95138, and by UPS Overnight and certified mail, return receipt requested at Pritchett's current residential address of 2381 Fairhaven Drive, Hollister, CA 95023. *GC Exhibits 5(g), (h) and (i)*. Partner Christopher Pritchett was served by UPS Overnight at Respondent's business address of 6010 Hellyer Avenue, San Jose, CA 95138, and by UPS Overnight and certified mail, return receipt requested at Pritchett's current residential address of 2381 Fairhaven Drive, Hollister, CA 95023. *GC Exhibits 5(j), (k) and (l)*.

5.

The Compliance Specification was also served by email on attorney Gary J. Clifford of the Polaris Law Group, as reflected on the December 19, 2012 email receipt attached as *GC Exhibit 5(m)*. Although Gary Clifford did not file a Notice of Appearance with the Region during the investigation of the instant charges or the subsequent prosecution of the unfair labor practice complaint, Clifford had represented to the Region that he represented partners Monica Pritchett and Christopher Pritchett in a private lawsuit involving Respondent.

6.

Pursuant to Section 102.56 of the Board's Rules and Regulations, the Compliance Specification notified Respondent it must file an Answer within 21 days from the date of the Compliance Specification. The Compliance Specification notified Respondent that if

no Answer is filed, the Board may find, pursuant to a Motion for Default Judgment that the allegations in the Compliance Specification are true.

7.

No Answer from Respondent or any of the Four Partners individually was received within 21 days of the service of the Compliance Specification. Accordingly, on January 25, 2013, the Region sent Respondent and each of the Four Partners individually, at both their business and home addresses, letters informing them that no Answer to the Compliance Specification had yet been received by the Region and which further advised each of them that, unless such Answer were filed by the close of business on February 1, 2013, the Region would file a Motion for Default Judgment with the Board. The Region also sent a letter to attorney Gary J. Clifford because he had previously contacted the Region stating that he represented Monica Pritchett and Christopher Pritchett in a private lawsuit involving Respondent. However, Clifford never filed a Notice of Appearance in the instant Board proceedings on behalf of either Respondent or Monica or Christopher Pritchett individually. (Copies of the January 25, 2013 default notification letters are attached as *GC Exhibits 6 (a), (b), (c), and (d)*). Said letters were served on Respondent by first class U.S. mail through serving partners Henry Rodriguez, Sr. and Henry Rodriguez, Jr. at their business address of 6010 Hellyer Avenue, San Jose, CA 95138 and their residential address of 320 Lassenpark Circle, San Jose, CA 95136 (*GC Exhibits 6(a) and 6(b)*), and partners Monica Pritchett and Christopher Pritchett at their residence address of 2381 Fairhaven Drive, Hollister, CA 95023 (*GC Exhibit 6(c)*). The January 25, 2013 letters to Henry Rodriguez, Sr. and Henry Rodriguez, Jr. were also served on partner Henry Rodriguez, Sr. by email at his email address of hnyro@aol.com. A copy

of the email to Rodriguez, Sr. is attached hereto as *GC Exhibit 7*. Finally, the letter mailed to attorney Gary Clifford at his firm's office in Hollister, California (*GC Exhibit 6(d)*) was also served by facsimile on attorney Gary Clifford at his law firm's offices in both Hollister and San Jose, California. Copies of the facsimile confirmations to Clifford are attached hereto as *GC Exhibits 8(a) and 8(b)*.

8.

To date, the Region has not received an Answer to the Compliance Specification issued in these cases from Respondent collectively or from any of the Four Partners individually. Where, as here, in the absence of good cause being shown for failure to file a timely answer, default judgment is appropriate. *Malik Roofing Corporation*, 338 NLRB 930 (2003). Here, the Respondent failed to file any type of timely response to the Acting General Counsel's Compliance Specification. Moreover, even though Respondent appears to be unrepresented by counsel, that does not excuse its failure to comply with the Board's Rules and Regulations. See, e.g. *All American Fire Protection, Inc.*, 336 NLRB 767 (2001). The Board has ruled that where respondents fail to file any timely response to a complaint, "merely being unrepresented by counsel does not establish a good cause explanation for failing to file a timely answer." *Country Lane Construction, Inc.*, 339 NLRB 1321 (2003) citing to *Lockhart Concrete*, 336 NLRB 956, 957 (2001).

9.

Section 102.56(a) of the Board's Rules and Regulations, Series 8, as amended, provides as follows:

Each respondent alleged in the specification to have compliance obligations shall, within 21 days from the service of the specification, file an original and four copies of an answer thereto with the Regional Director issuing the specification, and shall immediately serve a copy

thereof on the other parties. The answer to the specification shall be in writing, the original being signed and sworn to by the respondent or by a duly authorized agent with appropriate power of attorney affixed, and shall contain the mailing address of the respondent.

10.

Respondent and the Four Partners, having each been duly served, have failed and refused to file an answer to the Compliance Specification and Notice of Hearing. Therefore, all allegations in the Compliance Specification and Notice of Hearing must be admitted as true, and no issue of fact exists warranting or requiring a hearing. In the instant case, neither Respondent nor any of the Four Partners have sought an extension of time to file an Answer nor have they offered any explanation to this office for their failure to file an Answer to the Compliance Specification issued herein.

NOW, THEREFORE, in view of the matters set forth above, and upon consideration of the documents attached hereto and incorporated in this Motion, and in view of the failure of Respondent and/or any of the Four Partners to comply with the requirements of Section 102.56 of the Board's Rules and Regulations, Series 8, as amended, Counsel for the Acting General Counsel submits that the matter is appropriate for final determination upon default judgment without a hearing and that a final order

should be entered in accordance with the allegations of the Compliance Specification and Notice of Hearing, without taking evidence or giving Respondent further notice.

DATED AT Oakland, California this 6th day of February 2013.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "D. Criss Parker", written over a horizontal line.

D. Criss Parker
Counsel for the Acting General Counsel
NATIONAL LABOR RELATIONS BOARD
REGION 32
1301 Clay Street, Suite 300N
Oakland, CA 94612-5211

notice. This opinion is subject to formal revision before publication in the bound volumes of NLRB decisions. Readers are requested to notify the Executive Secretary, National Labor Relations Board, Washington, D.C. 20570, of any typographical or other formal errors so that corrections can be included in the bound volumes.

Henry Rodriguez, Sr., Henry Rodriguez, Jr., Monica Pritchett, and Christopher Pritchett, a California General Partnership d/b/a Life's Connections and Chris Mora and Constance Sifton.
Cases 32-CA-068654 and 32-CA-068656

September 18, 2012

DECISION AND ORDER

BY CHAIRMAN PEARCE AND MEMBERS GRIFFIN
AND BLOCK

The Acting General Counsel seeks a default judgment in this case on the ground that the Respondent failed to file an answer to the consolidated complaint. Upon charges filed on November 10, 2011, by Chris Mora in Case 32-CA-068654, and by Constance Sifton in Case 32-CA-068656, the Acting General Counsel issued an order consolidating cases, consolidated complaint and notice of hearing on April 10, 2012, against Henry Rodriguez Sr., Henry Rodriguez Jr., Monica Pritchett, and Christopher Pritchett, a California general partnership, d/b/a Life's Connections, the Respondent, alleging that it violated Section 8(a)(3) and (1) of the Act. The Respondent failed to file an answer.

On May 11, 2012, the Acting General Counsel filed a Motion for Default Judgment with the Board. Thereafter, on May 15, 2012, the Board issued an order transferring the proceeding to the Board and a Notice to Show Cause why the motion should not be granted. The Respondent filed no response. The allegations in the motion are therefore undisputed.

The National Labor Relations Board has delegated its authority in this proceeding to a three-member panel.

Ruling On Motion for Default Judgment

Section 102.20 of the Board's Rules and Regulations provides that the allegations in a complaint shall be deemed admitted if an answer is not filed within 14 days from service of the complaint, unless good cause is shown. In addition, the consolidated complaint affirmatively stated that unless an answer was received by April 24, 2012, the Board may find, pursuant to a motion for default judgment, that the allegations in the consolidated complaint are true.¹ The Respondent failed to file an answer.

¹ The Acting General Counsel's motion and attachments confirm that the Respondent and each of the four partners individually were properly served with the consolidated complaint at both their business and home addresses.

By separate letters dated April 27, 2012, the Region sent the Respondent and each of the four partners individually, at both their business and home addresses, a letter informing them that no answer to the consolidated complaint had been received and further advising them that unless an answer was received by May 4, 2012, a motion for default judgment would be filed. However, no answer was filed.²

In the absence of good cause being shown for the failure to file an answer to the consolidated complaint, we deem the allegations in the consolidated complaint and notice of hearing to be admitted as true, and we grant the Acting General Counsel's Motion for Default Judgment.

On the entire record, the Board makes the following

FINDINGS OF FACT

I. JURISDICTION

At all material times, the Respondent has been owned by Henry Rodriguez Sr., Henry Rodriguez Jr., Monica Pritchett, and Christopher Pritchett, as a California general partnership doing business as Life's Connections, with offices and places of business in Hollister and San Jose, California, and has been engaged in the provision of social services to disabled adults.

In conducting its operations during the calendar year ending December 31, 2011, the Respondent derived

² The Region also sent a copy of the reminder letter to attorney Gary J Clifford, who had previously informed the Region that he represented Monica and Christopher Pritchett in a private lawsuit involving the Respondent. By letter to the Region dated May 3, 2012, Clifford stated, among other things, that the Respondent's partnership had been dissolved on April 20, 2012, that Henry Rodriguez Sr. and Henry Rodriguez Jr. had assumed full control of the business and had been in control for several months prior to the dissolution, that due to this the Pritchetts were never afforded the opportunity to participate in the instant proceeding; and that the partnership was never properly served with the complaint as the Rodriguezes had changed the Respondent's physical location when the complaint was served. The letter also stated that "[i]n the event that you intend to amend the complaint to include the Pritchetts individually please notify me and I will file a Notice of Appearance." However, despite numerous requests from the Region, Clifford did not file a notice of appearance.

By letter to the Region dated May 8, 2012, Clifford repeated that the partnership dissolved on April 20, 2012, and asserted that "it would be impossible for the Pritchetts to file an answer" because the complaint was issued against a respondent for which they have no authority to file an answer. Neither the May 3, 2012 letter nor the May 8, 2012 letter addressed the consolidated complaint allegations or purported to be an answer to the consolidated complaint. It is well established that a respondent's dissolution does not excuse it from filing an answer to a complaint. See *DRW Electric*, 356 NLRB No. 121 slip op. at 1 fn. 2 (2011), *OK Toilet & Towel Supply, Inc.*, 339 NLRB 1100, 1100-1101 (2003), *Dong-A Daily North America*, 332 NLRB 15, 15-16 (2000).

In addition, we agree with the Acting General Counsel's assertion in his motion that the purported fact that the "Buyout Agreement" was signed on April 20, 2012, has no legal impact in this proceeding, particularly because the alleged unfair labor practices occurred in October 2011, some 6 months before the Buyout Agreement was signed.

GC Exhibit 1

gross revenues in excess of \$250,000 and during the same period of time, purchased and received goods or services valued in excess of \$1800 which originated outside the State of California.

We find that the Respondent is an employer engaged in commerce within the meaning of Section 2(2), (6), and (7) of the Act.

II. ALLEGED UNFAIR LABOR PRACTICES

At all material times, the individuals named below held the positions set forth opposite their respective names and have been supervisors of the Respondent within the meaning of Section 2(11) of the Act and agents of the Respondent within the meaning of Section 2(13) of the Act:

Henry Rodriguez Sr.—Owner/Co-Executive Director
 Henry Rodriguez Jr.—Owner/Senior Case Manager
 Monica Pritchett—Owner/Co-Executive Director
 Christopher Pritchett—Owner/Director of Operations

The consolidated complaint alleges that the Respondent engaged in the following conduct.

1. On October 5, 2011, the Respondent, at its Hollister, California facility, acting through Henry Rodriguez Sr., threatened to terminate employees because they concertedly complained about a pay cut; told employees not to tell each other how much they were paid or to discuss their terms and conditions of employment with each other; and told employees that their protected concerted activities, including discussion about their wages, constituted insubordination and a breach of confidentiality.

2. On October 5, 2011, the Respondent, at its Hollister, California facility, acting through Monica Pritchett, threatened employees that their protected concerted activities, including discussion about their wages, constituted insubordination and would not be tolerated.

3. On October 7, 2011, the Respondent, at its Hollister, California facility, acting through Henry Rodriguez Sr. and Monica Pritchett, issued a written suspension notice to an employee which cited the employee's protected concerted activities as a reason for the issuance of the suspension and which prohibited the employee from discussing work-related subjects with coworkers while the employee was on suspension.

4. On October 20, 2011, the Respondent, at its San Jose facility, acting through Henry Rodriguez Sr., told an employee that the employee was being discharged because of the employee's protected concerted activities and because it had come to his attention that the employee had spoken to other employees about unionizing.

5. In about September and October 2011, the Respondent's employees Chris Mora and Constance Sifton engaged in concerted activities with each other and with other employees for the purposes of collective-bargaining and other mutual aid and protection by contacting the State of California Department of Labor Standards Enforcement, by complaining about their pay schedule and a pay cut, and by discussing their wages and other terms and conditions of employment with each other and with other employees.

6. On October 7, 2011, the Respondent suspended employee Chris Mora.

7. On October 18 and 19, 2011, the Respondent eliminated the work hours of employee Constance Sifton.

8. On October 20, 2011, the Respondent terminated employee Constance Sifton.

9. On October 21, 2011, the Respondent terminated employee Chris Mora.

10. The Respondent engaged in the conduct described above in paragraphs 6–9 because Chris Mora and Constance Sifton engaged in the conduct described above in paragraph 5, and to discourage employees from engaging in these and other concerted activities.

11. The Respondent engaged in the conduct described above in paragraphs 7 and 8 because the Respondent mistakenly believed employee Constance Sifton formed, joined, or assisted a union, and engaged in concerted activity, and to discourage employees from engaging in these activities.

CONCLUSIONS OF LAW

1. By the conduct described above in paragraphs 1–4 and 6–9, the Respondent has been interfering with, restraining, and coercing employees in the exercise of the rights guaranteed in Section 7 of the Act in violation of Section 8(a)(1) of the Act.

2. By the conduct described above in paragraphs 7, 8 and 11, the Respondent has been discriminating in regard to the hire or tenure or conditions of employment of its employees, thereby discouraging membership in a labor organization, in violation of Section 8(a)(3) and (1) of the Act.

3. The unfair labor practices of the Respondent, described above, affect commerce within the meaning of Section 2(6) and (7) of the Act.

REMEDY

Having found that the Respondent has engaged in certain unfair labor practices, we shall order it to cease and desist and to take certain affirmative action designed to effectuate the policies of the Act. Having found that the Respondent violated Section 8(a)(1) of the Act by discharging Chris Mora and Constance Sifton, and addition-

ally violated Section 8(a)(3) by discharging Sifton, we shall order the Respondent to offer them full reinstatement to their former jobs or, if those jobs no longer exist, to substantially equivalent positions, without prejudice to their seniority or any other rights or privileges previously enjoyed. Further, we shall order the Respondent to make whole Chris Mora and Constance Sifton for any loss of earnings or other benefits suffered as a result of the Respondent's unlawful actions against them. Backpay shall be computed in accordance with *F W Woolworth Co.*, 90 NLRB 289 (1950), with interest at the rate prescribed in *New Horizons for the Retarded*, 283 NLRB 1173 (1987), compounded daily as prescribed in *Kentucky River Medical Center*, 356 NLRB No. 8 (2010)³

In addition, having found that the Respondent violated Section 8(a)(1) by suspending Chris Mora on October 7, 2011, and violated Section 8(a)(1) and (3) by eliminating the work hours of Constance Sifton on October 18 and 19, 2011, we shall order the Respondent to rescind Chris Mora's suspension and reinstate Constance Sifton's hours. We shall also order the Respondent to make Chris Mora and Constance Sifton whole for any loss of earnings or other benefits suffered as a result of the Respondent's unlawful actions against them. Backpay shall be computed in accordance with *F. W. Woolworth Co.*, supra (for the unlawful suspension), and *Ogle Protection Service*, 183 NLRB 682 (1970), enfd. 444 F 2d 502 (6th Cir. 1971) (for the unlawful elimination of work hours), with interest at the rate prescribed in *New Horizons for the Retarded*, supra, compounded daily as prescribed in *Kentucky River Medical Center*, supra.

The Respondent shall also be required to remove from its files any and all references to the unlawful discharge of Chris Mora and Constance Sifton, the unlawful suspension of Chris Mora on October 7, 2011, and the unlawful elimination of the work hours of Constance Sifton on October 18 and 19, 2011. The Respondent shall notify Chris Mora and Constance Sifton in writing that this has been done and that the unlawful references will not be used against them in any way.

³ The Acting General Counsel's motion seeks an order requiring reimbursement of amounts equal to the difference in taxes owed upon receipt of a lump-sum payment and taxes that would have been owed had there been no discrimination. Further, the Acting General Counsel requests that the Respondent be required to submit the appropriate documentation to the Social Security Administration so that when backpay is paid, it will be allocated the appropriate pay periods. Because the relief sought would involve a change in Board law, we believe that the appropriateness of this proposed remedy should be resolved after a full briefing by the affected parties, and there has been no such briefing in this case. Accordingly, we decline to order this relief at this time. See e.g., *Ishikawa Gasket America, Inc.*, 337 NLRB 175, 176 (2001), enfd. 354 F 3d 534 (6th Cir. 2004), and cases cited therein.

ORDER

The National Labor Relations Board orders that the Respondent, Henry Rodriguez, Sr., Henry Rodriguez, Jr., Monica Pritchett, and Christopher Pritchett, a California General Partnership, d/b/a Life's Connections, Hollister and San Jose, California, its officers, agents, successors, and assigns, shall

1. Cease and desist from

(a) Threatening to discharge employees because they concertedly complained about a pay cut.

(b) Telling employees not to tell each other how much they are paid or to discuss their terms and conditions of employment with each other.

(c) Telling employees that their protected concerted activities, including discussion about their wages, constitute insubordination and a breach of confidentiality.

(d) Threatening employees that their protected concerted activities, including discussion about their wages, constitutes insubordination and will not be tolerated.

(e) Issuing written suspension notices to employees which cite their protected concerted activities as a reason for the suspension and which prohibit employees from discussing work-related subjects with coworkers while they are on suspension.

(f) Telling employees that they are being discharged because of their protected concerted activities and because employees speak to each other about unionizing.

(g) Suspending employees because they engage in protected concerted activities, and to discourage employees from engaging in these activities.

(h) Eliminating employees' work hours because they formed, joined, or assisted a union and engaged in protected concerted activities, or because the Respondent believes they have done so, and to discourage employees from engaging in these activities.

(i) Discharging employees because they formed, joined, or assisted a union and engaged in protected concerted activities, or because the Respondent believes they have done so, and to discourage employees from engaging in these activities.

(j) In any like or related manner interfering with, restraining, or coercing employees in the exercise of the rights guaranteed them by Section 7 of the Act.

2. Take the following affirmative action necessary to effectuate the policies of the Act.

(a) Within 14 days from the date of this Order, offer Chris Mora and Constance Sifton reinstatement to their former jobs or, if those jobs no longer exist, to substantially equivalent positions, without prejudice to their seniority or any other rights or privileges previously enjoyed

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(b) Make whole Chris Mora and Constance Sifton for any loss of earnings and other benefits suffered as a result of the discrimination against them, in the manner set forth in the remedy section of this decision.

(c) Rescind the suspension of Chris Mora.

(d) Reinstate the work hours of Constance Sifton.

(e) Within 14 days from the date of this Order, remove from their files all references to the unlawful discharge of Chris Mora and Constance Sifton, the suspension of Chris Mora, and the elimination of the work hours of Constance Sifton, and, within 3 days thereafter, notify the discriminatees in writing that this has been done and that its unlawful conduct will not be used against them in any way.

(f) Preserve and, within 14 days of a request, or such additional time as the Regional Director may allow for good cause shown, provide at a reasonable place designated by the Board or its agents, all payroll records, social security payment records, timecards, personnel records and reports, and all other records including an electronic copy of such records if stored in electronic form, necessary to analyze the amount of backpay due under the terms of this Order.

(g) Within 14 days after service by the Region, post at its facilities in Hollister and San Jose, California, copies of the attached notice marked "Appendix."⁴ Copies of the notice, on forms provided by the Regional Director for Region 32, after being signed by the Respondent's authorized representative, shall be posted by the Respondent and maintained for 60 consecutive days in conspicuous places including all places where notices to employees are customarily posted. In addition to physical posting of paper notices, notices shall be distributed electronically, such as by email, posting on an intranet or an internet site, and/or other electronic means, if the Respondent customarily communicates with its employees by such means. Reasonable steps shall be taken by the Respondent to ensure that the notices are not altered, defaced or covered by any other material. In the event that, during the pendency of these proceedings, the Respondent has gone out of business or closed the facilities involved in these proceedings, the Respondent shall duplicate and mail, at its own expense, a copy of the notice to all current employees and former employees employed by the Respondent at any time since October 5, 2011.

(h) Within 21 days after service by the Region, file with the Regional Director for Region 32 a sworn certifi-

cation of a responsible official on a form provided by the Region attesting to the steps that the Respondent has taken to comply.

Dated, Washington, D.C. September 18, 2012

Mark Gaston Pearce, Chairman

Richard F. Griffin, Jr., Member

Sharon Block Member

(SEAL) NATIONAL LABOR RELATIONS BOARD

APPENDIX

NOTICE TO EMPLOYEES
POSTED BY ORDER OF THE
NATIONAL LABOR RELATIONS BOARD
An Agency of the United States Government

The National Labor Relations Board has found that we violated the National Labor Relations Act and has ordered us to post and abide by this notice.

FEDERAL LAW GIVES YOU THE RIGHT TO

Form, join, or assist a union

Choose representatives to bargain with us on your behalf

Act together with other employees for your benefit and protection

Choose not to engage in any of these protected activities.

WE WILL NOT threaten to discharge you because you concertedly complain about a pay cut.

WE WILL NOT tell you not to tell each other how much you are paid or to discuss your terms and conditions of employment with each other.

WE WILL NOT tell you that your protected concerted activities, including discussions about your wages, constitute insubordination and a breach of confidentiality.

WE WILL NOT threaten you that your protected concerted activities, including discussions about your wages, constitute insubordination and will not be tolerated.

WE WILL NOT issue written suspension notices to you which cite your protected concerted activities as a reason for the suspension and which prohibit you from discuss-

⁴ If this Order is enforced by a judgment of a United States court of appeals, the words in the notice reading "Posted By Order of the National Labor Relations Board" shall read "Posted Pursuant to a Judgment of the United States Court of Appeals Enforcing an Order of the National Labor Relations Board."

ing work-related subjects with coworkers while you are on suspension

WE WILL NOT tell you that you are being discharged because of your protected concerted activities and because you speak to each other about unionizing.

WE WILL NOT suspend you because you engage in protected concerted activities, and to discourage you from engaging in these activities.

WE WILL NOT eliminate your work hours because you formed, joined, or assisted a union and engaged in protected concerted activities, or because we believe you engage in such activities and to discourage you from engaging in these activities.

WE WILL NOT discharge you because you formed, joined, or assisted a union and engaged in protected concerted activities, or because we believe you have done so and to discourage you from engaging in these activities

WE WILL NOT in any like or related manner interfere with, restrain, or coerce you in the exercise of the rights listed above

WE WILL, within 14 days from the date of this Order, offer Chris Mora and Constance Sifton reinstatement to

their former jobs or, if those jobs no longer exist, to substantially equivalent positions, without prejudice to their seniority or any other rights or privileges previously enjoyed.

WE WILL make whole Chris Mora and Constance Sifton for any loss of earnings and other benefits suffered as a result of our discrimination against them, plus interest.

WE WILL rescind Chris Mora's suspension.

WE WILL reinstate the work hours of Constance Sifton.

WE WILL, within 14 days from the date of the Board's Order, remove from our files all references to the unlawful actions against Chris Mora and Constance Sifton, and WE WILL, within 3 days thereafter, notify each of them in writing that this has been done and that our unlawful conduct will not be used against them in any way.

HENRY RODRIGUEZ, SR., HENRY RODRIGUEZ, JR., MONICA PRITCHETT, AND CHRISTOPHER PRITCHETT, A CALIFORNIA GENERAL PARTNERSHIP| D/B/A LIFE'S CONNECTIONS

FILED

UNITED STATES COURT OF APPEALS

NOV 06 2012

FOR THE NINTH CIRCUIT

MOLLY C. DWYER, CLERK
U.S. COURT OF APPEALS

<p>NATIONAL LABOR RELATIONS BOARD,</p> <p style="text-align: center;">Petitioner,</p> <p>v.</p> <p>HENRY RODRIGUEZ, Sr.; et al.,</p> <p style="text-align: center;">Respondents.</p>
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No. 12-73360

NLRB Nos. 32-CA-68654
32-CA-68656

ORDER

Before: LEAVY, TROTT, and RAWLINSON, Circuit Judges.

The application of the National Labor Relations Board for summary enforcement of its September 18, 2012 order is granted. Unless objections as to form are received within 14 days of the date of this order, the form of judgment already submitted by the National Labor Relations Board will be the judgment of the court.

The Clerk of the court shall serve the proposed judgment on respondents.

hmb/MOATT

GC Exhibit 2

UNITED STATES COURT OF APPEALS
FOR THE NINTH CIRCUIT

NATIONAL LABOR RELATIONS BOARD	:	
	:	
Petitioner	:	No.
v.	:	
	:	
HENRY RODRIGUEZ, SR., HENRY RODRIGUEZ, JR.,	:	Board Case Nos.
MONICA PRITCHETT, AND CHRISTOPHER	:	32-CA-68654
PRITCHETT, A CALIFORNIA GENERAL	:	32-CA-68656
PARTNERSHIP, D/B/A LIFE’S CONNECTIONS	:	
	:	
Respondent	:	

JUDGMENT ENFORCING AN ORDER OF THE
NATIONAL LABOR RELATIONS BOARD

Before:

This cause was submitted upon the application of the National Labor Relations Board for summary entry of a judgment against Respondent, Henry Rodriguez, Sr., Henry Rodriguez, Jr., Monica Pritchett, and Christopher Pritchett, a California General Partnership, d/b/a Life’s Connections, its officers, agents, successors, and assigns, enforcing its order dated September 18, 2012, in Case Nos. 32-CA-68654 and 32-CA-68656, and the Court having considered the same, it is hereby

ORDERED AND ADJUDGED by the Court that the Respondent, Henry Rodriguez, Sr., Henry Rodriguez, Jr., Monica Pritchett, and Christopher Pritchett, a California General Partnership, d/b/a Life’s Connections., its officers, agents, successors, and assigns, shall abide by said order (See Attached Order and Appendix).

Endorsed, Judgment Filed and Entered

/s/ Molly Dwyer
Molly Dwyer
Clerk

NATIONAL LABOR RELATIONS BOARD

v.

HENRY RODRIGUEZ, SR., HENRY RODRIGUEZ, JR.,
MONICA PRITCHETT, AND CHRISTOPHER PRITCHETT,
A CALIFORNIA GENERAL PARTNERSHIP, D/B/A LIFE'S CONNECTIONS

ORDER

Henry Rodriguez, Sr., Henry Rodriguez, Jr., Monica Pritchett, and Christopher Pritchett, a California General Partnership, d/b/a Life's Connections, Hollister and San Jose, California, its officers, agents, successors, and assigns, shall

1. Cease and desist from
 - (a) Threatening to discharge employees because they concertedly complained about a pay cut.
 - (b) Telling employees not to tell each other how much they are paid or to discuss their terms and conditions of employment with each other.
 - (c) Telling employees that their protected concerted activities, including discussion about their wages, constitute insubordination and a breach of confidentiality.
 - (d) Threatening employees that their protected concerted activities, including discussion about their wages, constitutes insubordination and will not be tolerated.
 - (e) Issuing written suspension notices to employees which cite their protected concerted activities as a reason for the suspension and which prohibit employees from discussing work-related subjects with coworkers while they are on suspension.
 - (f) Telling employees that they are being discharged because of their protected concerted activities and because employees speak to each other about unionizing.
 - (g) Suspending employees because they engage in protected concerted activities, and to discourage employees from engaging in these activities.
 - (h) Eliminating employees' work hours because they formed, joined, or assisted a union and engaged in protected concerted activities, or because the Respondent believes they have done so, and to discourage employees from engaging in these activities.
 - (i) Discharging employees because they formed, joined, or assisted a union and engaged in protected concerted activities, or because the Respondent

believes they have done so, and to discourage employees from engaging in these activities.

- (j) In any like or related manner interfering with, restraining, or coercing employees in the exercise of the rights guaranteed them by Section 7 of the Act.

2. Take the following affirmative action necessary to effectuate the policies of the Act.

- (a) Within 14 days from the date of this Order, offer Chris Mora and Constance Sifton reinstatement to their former jobs or, if those jobs no longer exist, to substantially equivalent positions, without prejudice to their seniority or any other rights or privileges previously enjoyed.
- (b) Make whole Chris Mora and Constance Sifton for any loss of earnings and other benefits suffered as a result of the discrimination against them, in the manner set forth in the remedy section of this decision.
- (c) Rescind the suspension of Chris Mora.
- (d) Reinstate the work hours of Constance Sifton.
- (e) Within 14 days from the date of this Order, remove from their files all references to the unlawful discharge of Chris Mora and Constance Sifton, the suspension of Chris Mora, and the elimination of the work hours of Constance Sifton, and, within 3 days thereafter, notify the discriminatees in writing that this has been done and that its unlawful conduct will not be used against them in any way.
- (f) Preserve and, within 14 days of a request, or such additional time as the Regional Director may allow for good cause shown, provide at a reasonable place designated by the Board or its agents, all payroll records, social security payment records, timecards, personnel records and reports, and all other records including an electronic copy of such records if stored in electronic form, necessary to analyze the amount of backpay due under the terms of this Order.
- (g) Within 14 days after service by the Region, post at its facilities in Hollister and San Jose, California, copies of the attached notice marked "Appendix." Copies of the notice, on forms provided by the Regional Director for Region 32, after being signed by the Respondent's authorized representative, shall be posted by the Respondent and maintained for 60 consecutive days in conspicuous places including all places where notices to employees are customarily posted. In addition to physical posting of paper notices, notices shall be distributed electronically, such as by email, posting on an intranet or an internet site,

and/or other electronic means, if the Respondent customarily communicates with its employees by such means. Reasonable steps shall be taken by the Respondent to ensure that the notices are not altered, defaced or covered by any other material. In the event that, during the pendency of these proceedings, the Respondent has gone out of business or closed the facilities involved in these proceedings, the Respondent shall duplicate and mail, at its own expense, a copy of the notice to all current employees and former employees employed by the Respondent at any time since October 5, 2011.

- (h) Within 21 days after service by the Region, file with the Regional Director for Region 32 a sworn certification of a responsible official on a form provided by the Region attesting to the steps that the Respondent has taken to comply.

APPENDIX

NOTICE TO EMPLOYEES

POSTED PURSUANT TO A JUDGMENT OF THE UNITED STATES
COURT OF APPEALS ENFORCING AN ORDER OF THE
NATIONAL LABOR RELATIONS BOARD
An Agency of the United States Government

The National Labor Relations Board has found that we violated the National Labor Relations Act and has ordered us to post and abide by this notice.

FEDERAL LAW GIVES YOU THE RIGHT TO

Form, join, or assist a union

Choose representatives to bargain with us on your behalf

Act together with other employees for your benefit and protection

Choose not to engage in any of these protected activities.

WE WILL NOT threaten to discharge you because you concertedly complain about a pay cut.

WE WILL NOT tell you not to tell each other how much you are paid or to discuss your terms and conditions of employment with each other.

WE WILL NOT tell you that your protected concerted activities, including discussions about your wages, constitute insubordination and a breach of confidentiality.

WE WILL NOT threaten you that your protected concerted activities, including discussions about your wages, constitute insubordination and will not be tolerated.

WE WILL NOT issue written suspension notices to you which cite your protected concerted activities as a reason for the suspension and which prohibit you from discussing work-related subjects with coworkers while you are on suspension.

WE WILL NOT tell you that you are being discharged because of your protected concerted activities and because you speak to each other about unionizing.

WE WILL NOT suspend you because you engage in protected concerted activities, and to discourage you from engaging in these activities.

WE WILL NOT eliminate your work hours because you formed, joined, or assisted a union and engaged in protected concerted activities, or because we believe you engage in such activities and to discourage you from engaging in these activities.

WE WILL NOT discharge you because you formed, joined, or assisted a union and engaged in protected concerted activities, or because we believe you have done so and to discourage you from engaging in these activities.

WE WILL NOT in any like or related manner interfere with, restrain, or coerce you in the exercise of the rights listed above.

WE WILL, within 14 days from the date of this Order, offer Chris Mora and Constance Sifton reinstatement to their former jobs or, if those jobs no longer exist, to substantially equivalent positions, without prejudice to their seniority or any other rights or privileges previously enjoyed.

WE WILL make whole Chris Mora and Constance Sifton for any loss of earnings and other benefits suffered as a result of our discrimination against them, plus interest.

WE WILL rescind Chris Mora's suspension.

WE WILL reinstate the work hours of Constance Sifton.

WE WILL, within 14 days from the date of the Board's Order, remove from our files all references to the unlawful actions against Chris Mora and Constance Sifton, and WE WILL, within 3 days thereafter, notify each of them in writing that this has been done and that our unlawful conduct will not be used against them in any way.

HENRY RODRIGUEZ, SR., HENRY RODRIGUEZ, JR.,
MONICA PRITCHETT, AND CHRISTOPHER PRITCHETT,
A CALIFORNIA GENERAL PARTNERSHIP D/B/A LIFE'S CONNECTIONS

**UNITED STATES OF AMERICA
BEFORE THE NATIONAL LABOR RELATIONS BOARD
REGION 32**

**HENRY RODRIGUEZ, SR., HENRY RODRIGUEZ, JR.,
MONICA PRITCHETT, and CHRISTOPHER PRITCHETT,
a CALIFORNIA GENERAL PARTNERSHIP, d/b/a
LIFE'S CONNECTIONS**

and

Case 32-CA-068654

CHRIS MORA, an Individual

and

**HENRY RODRIGUEZ, SR., HENRY RODRIGUEZ, JR.,
MONICA PRITCHETT, and CHRISTOPHER PRITCHETT,
a CALIFORNIA GENERAL PARTNERSHIP, d/b/a
LIFE'S CONNECTIONS**

and

Case 32-CA-068656

CONSTANCE SIFTON, an Individual

COMPLIANCE SPECIFICATION AND NOTICE OF HEARING

On September 18, 2012, the National Labor Relations Board, herein called the Board, issued its Decision and Order, reported at 358 NLRB No. 139 in Cases 32-CA-068654 and 32-CA-068656, directing Henry Rodriguez, Sr., Henry Rodriguez, Jr., Monica Pritchett, and Christopher Pritchett, a California general partnership, d/b/a Life's Connections (herein collectively called "Respondent") its officers, agents, successors, and assigns, to, *inter alia*, offer Chris Mora and Constance Sifton immediate reinstatement to their former jobs or, if those jobs no longer exist, to substantially equivalent positions, without prejudice to their seniority or any other rights or privileges previously enjoyed, and make them whole for the losses they suffered as a result of the discrimination against them in violation of Section 8(a)(1) and (3) of the

GC Exhibit 3

National Labor Relations Act; on November 6, 2012, the United States Court of Appeals for the Ninth Circuit granted the Board's Application for Summary Entry of a Judgment Enforcing an Order of the National Labor Relations Board. On November 22, the form of judgment submitted by the National Labor Relations Board became the judgment of the court enforcing in full the provisions of the Board's Order; and, as controversy currently exists over the amounts of backpay due under the terms of the Board's Order, the undersigned Regional Director of the National Labor Relations Board for Region 32, pursuant to the authority duly conferred upon him by the Board, hereby issues this Compliance Specification and alleges that the backpay owing to Chris Mora and Constance Sifton is as follows:

BACKPAY PERIOD¹

- (1) The backpay period for Mora starts on October 7, 2011, the date that the Respondent suspended, and later terminated him, and continues until a valid offer of reinstatement is made.
- (2) The backpay period for Constance Sifton starts on October 18, 2011, the date that the Respondent eliminated her work hours, and later terminated her, and continues until a valid offer of reinstatement is made.

COMPUTATION OF GROSS BACKPAY²

- (3) An appropriate measure of gross backpay for the discriminatees is the amount they would have earned if continually employed by Respondent during the backpay period.

¹ As the backpay period is still running, calculations in this compliance specification show backpay as of the end of the present quarter, on December 31, 2012. Thereafter, in the absence of compliance, the calculations will need to be updated.

² Counsel for the General Counsel reserves the right to amend the specification pursuant to new evidence obtained, including but not limited to payroll records submitted by Respondent, and to reflect additional monies that may be owed to either of the discriminatees.

(4) Prior to the unlawful conduct Mora earned \$2,000 per month from the Respondent. The Respondent paid Mora \$1,000 on or about the 15th day of each month, and \$1,000 each last day of the month.

(5) As set forth in Exhibit 1, Mora's earning for the fourth quarter of 2011 would have been \$5,600, and for each full quarter thereafter, his gross earnings would have been \$6,000.

(6) Prior to the unlawful conduct Sifton earned \$12 per hour and worked approximately 40 hours each week.

(7) Regular earnings for Sifton are computed by multiplying the approximate number of regular hours that she would have worked in each calendar quarter by the wage rate that she was paid.

(8) As set forth in Exhibit 2, Sifton's earning for the fourth quarter of 2011 would have been \$5,184, and for each full quarter thereafter, her gross earnings would have been approximately \$6,240.

(9) Calendar quarter gross backpay is the sum of calendar quarter regular earnings.

(10) Calendar quarter net backpay is the difference between calendar quarter gross backpay and calendar quarter net interim earnings.

INTERIM EARNINGS

(11) Mora's interim earnings are set forth in Exhibit 1.

(12) Sifton's interim earnings are set forth in Exhibit 2.

SUMMARY

Summarizing the facts and calculations specified above, the obligation of Respondent with respect to the amount of backpay, as of December 31, 2012, as set forth herein will be satisfied by payment of \$24,222 to Chris Mora, and \$15,687 to Constance Sifton, plus interest accrued to the date of payment at the rate prescribed in *New Horizons for the Retarded*, 283

NLRB 1173 (1987), compounded daily as prescribed in *Kentucky River Medical Center*, 356 NLRB No. 8 (2010).

ANSWER REQUIREMENT

Respondent is notified that, pursuant to Section 102.56 of the Board's Rules and Regulations, it must file an answer to the compliance specification. The answer must be **received by this office on or before January 9, 2013, or postmarked on or before January 8, 2013.** Unless filed electronically in a PDF format, Respondent should file an original and four copies of the answer with this office and serve a copy of the answer on each of the other parties.

An answer may also be filed electronically by using the E-Filing system on the Agency's website. In order to file an answer electronically, access the Agency's website at <http://www.nlr.gov>, click on **E-Gov**, then click on the **E-Filing** link on the pull-down menu. Click on the "File Documents" button under "Regional, Subregional and Resident Offices" and then follow the directions. The responsibility for the receipt and usability of the answer rests exclusively upon the sender. Unless notification on the Agency's website informs users that the Agency's E-Filing system is officially determined to be in technical failure because it is unable to receive documents for a continuous period of more than 2 hours after 12 noon (Eastern Time) on the due date for filing, a failure to timely file the answer will not be excused on the basis that the transmission could not be accomplished because the Agency's website was off-line or unavailable for some other reason. The Board's Rules and Regulations require that such answer be signed and sworn to by the respondent or by a duly authorized agent with appropriate power of attorney affixed. See Section 102.56(a). If the answer being filed electronically is a PDF document containing the required signature, no paper copies of the answer need to be transmitted to the Regional Office. However, if the electronic version of an answer to a compliance

specification is not a PDF file containing the required signature, then the Efiling rules require that such answer containing the required signature be submitted to the Regional Office by traditional means within three (3) business days after the date of electronic filing.

Service of the answer on each of the other parties must be accomplished in conformance with the requirements of Section 102.114 of the Board's Rules and Regulations. The answer may not be filed by facsimile transmission.

As to all matters set forth in the compliance specification that are within the knowledge of Respondent, including but not limited to the various factors entering into the computation of gross backpay, a general denial is not sufficient. See Section 102.56(b) of the Board's Rules and Regulations, a copy of which is attached. Rather, the answer must state the basis for any disagreement with any allegations that are within the Respondent's knowledge, and set forth in detail Respondent's position as to the applicable premises and furnish the appropriate supporting figures.

If no answer is filed or if an answer is filed untimely, the Board may find, pursuant to a Motion for Default Judgment, that the allegations in the compliance specification are true. If the answer fails to deny allegations of the compliance specification in the manner required under Section 102.56(b) of the Board's Rules and Regulations, and the failure to do so is not adequately explained, the Board may find those allegations in the compliance specification are true and preclude Respondent from introducing any evidence controverting those allegations.

NOTICE OF HEARING

PLEASE TAKE NOTICE THAT on February 25, 9:00 a.m., at the Oakland Regional Office of the Board, 1301 Clay Street, Suite 300N, Oakland, CA, 94612-5224, and on consecutive days thereafter until concluded, a hearing will be conducted before an administrative

law judge of the National Labor Relations Board. At the hearing, Respondent and any other party to this proceeding have the right to appear and present testimony regarding the allegations in this compliance specification. The procedures to be followed at the hearing are described in the attached Form NLRB-4668. The procedure to request a postponement of the hearing is described in the attached Form NLRB-4338.

DATED AT Oakland, California this 19th day of December 2012.

/s/

William A. Baudler
Regional Director
National Labor Relations Board
Region 32
1301 Clay Street, Suite 300N
Oakland, CA 94612-5224

**UNITED STATES OF AMERICA
BEFORE THE NATIONAL LABOR RELATIONS BOARD
REGION 32**

**HENRY RODRIGUEZ, SR., HENRY RODRIGUEZ, JR.,
MONICA PRITCHETT, and CHRISTOPHER
PRITCHETT, a CALIFORNIA GENERAL
PARTNERSHIP, d/b/a LIFE'S CONNECTIONS**

Case(s) 32-CA-068654

and

CHRIS MORA, an Individual

and

**HENRY RODRIGUEZ, SR., HENRY RODRIGUEZ, JR.,
MONICA PRITCHETT, and CHRISTOPHER
PRITCHETT, a CALIFORNIA GENERAL
PARTNERSHIP, d/b/a LIFE'S CONNECTIONS**

32-CA-068656

and

CONSTANCE SIFTON, an Individual

**CORRECTED AFFIDAVIT OF SERVICE OF COMPLIANCE SPECIFICATION AND NOTICE
OF HEARING**

I, the undersigned employee of the National Labor Relations Board, state under oath that on **December 19, 2012**, I served the above-entitled document(s) by post-paid regular mail, and/or electronically, upon the following persons, addressed to them at the following addresses:

<p>Henry Rodriguez, Sr., Executive Director Life's Connections 6010 Hellyer Avenue San Jose, CA 95138-1014 VIA UPS OVERNIGHT SERVICE VIA U.S. CERTIFIED MAIL</p>	<p>Henry Rodriguez, Sr. 320 Lassenpark Circle San Jose, CA 95136-2130 VIA UPS OVERNIGHT SERVICE VIA U.S. CERTIFIED MAIL</p>
<p>Henry Rodriguez, Jr. Life's Connections 6010 Hellyer Avenue San Jose, CA 95138-1014 VIA UPS OVERNIGHT SERVICE VIA U.S. CERTIFIED MAIL</p>	<p>Henry Rodriguez, Jr. 320 Lassenpark Circle San Jose, CA 95136-2130 VIA UPS OVERNIGHT SERVICE VIA U.S. CERTIFIED MAIL</p>
<p>Monica Pritchett Life's Connections 6010 Hellyer Avenue San Jose, CA 95138-1014 VIA E-MAIL: <u>monicapritchett@yahoo.com</u> VIA UPS OVERNIGHT SERVICE VIA U.S. CERTIFIED MAIL</p>	<p>Monica Pritchett 2381 Fairhaven Drive Hollister, CA 95023-8017 VIA E-MAIL: <u>monicapritchett@yahoo.com</u> VIA UPS OVERNIGHT SERVICE VIA U.S. CERTIFIED MAIL</p>

GC Exhibit 4

Christopher Pritchett Life's Connections 6010 Hellyer Avenue San Jose, CA 95138-1014 VIA UPS OVERNIGHT SERVICE VIA U.S. CERTIFIED MAIL	Christopher Pritchett 2381 Fairhaven Drive Hollister, CA 95023-8017 VIA UPS OVERNIGHT SERVICE VIA U.S. CERTIFIED MAIL
Gary J. Clifford Polaris Law Group, LLP 501 San Benito Street, Suite 200 Hollister, CA 95023 COURTESY COPY SENT VIA E-MAIL: <u>gary@polarislawgroup.com</u>	Christopher Mora 551 Arbour Lane Hollister, CA 95023-7101 VIA U.S. REGULAR MAIL
National Labor Relations Board Division Of Judges 901 Market St., Suite 300 San Francisco, CA 94103 E-FILE	Constance A. Sifton 100 S Coalinga Street Apartment C Coalinga, CA 93210-2404 VIA U.S. REGULAR MAIL
Attn: Davette Repola AVTranz 845 N. 3 rd Avenue Phoenix, AZ 85003 VIA E-MAIL: <u>davette.repola@avtranz.com</u>	

December 19, 2012

Frances Hayden, Designated Agent of NLRB

Date

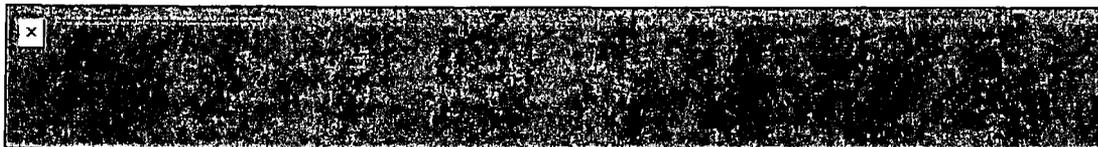
Name



Signature

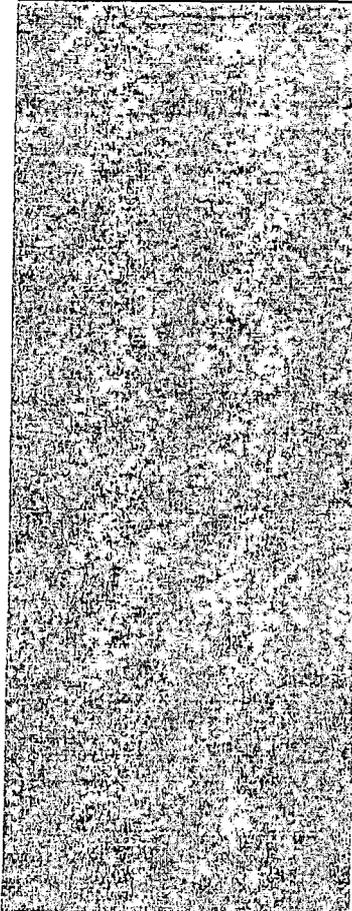
Hayden, Frances

From: UPS Quantum View [auto-notify@ups.com]
Sent: Thursday, December 20, 2012 9:51 AM
To: Hayden, Frances
Subject: UPS Delivery Notification, Tracking Number 1ZA4F740NT95168348



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Message from R-32: NLRB - CA:
Life's Connections Compliance Spec/NOH

Tracking Number: 1ZA4F740NT95168348
Delivery Date / Time: 20-December-2012 / 9:27 AM

Delivery Location: RECEIVER
Signed by: RODRIGUEZ

Shipment Detail

Ship To:
Henry Rodriguez, Sr.
Life's Connections
6010 HELLYER AVE
SAN JOSE
CA
95138
US

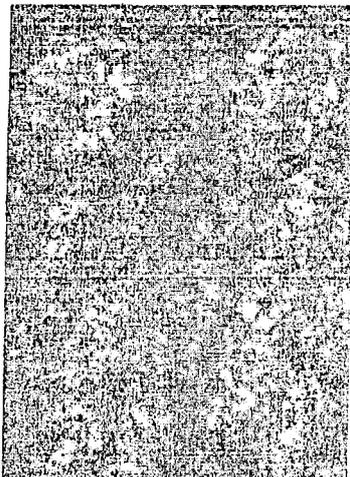
Number of Packages: 1

UPS Service: NEXT DAY AIR

Shipment Type: Letter

Reference: Regional Attorney's Office

GC Exhibit 5(a)



Number 1:
Reference
Number 2: FHayden
Reference
Number 3: 32-CA-068654/Compliance
Spec/NOH

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VIEW LABEL PRINT DETAILS

YOUR LABEL NUMBER	SERVICE	STATUS OF YOUR ITEM	DATE & TIME	LOCATION	FEATURES
7001251000760319088		Delivered	December 21, 2012, 11 04 am	SAN JOSE CA 95138	Certified Mail™
		Arrival at Unit	December 21, 2012, 7 53 am	SAN JOSE CA 95111	
		Depart USPS Sort Facility	December 21, 2012	SAN JOSE, CA 95101	
		Processed through USPS Sort Facility	December 21, 2012, 3 15 am	SAN JOSE CA 95101	

Check on Another Item

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Return Receipt Fee		
(End)	Henry Rodriguez, Sr., Executive Director	
Res	Life's Connections	
(End)	6010 Hellyer Avenue	
Tot	San Jose, CA 95138-1014	
Sent	Street, or PO Box No	
	City, State, ZIP+4	

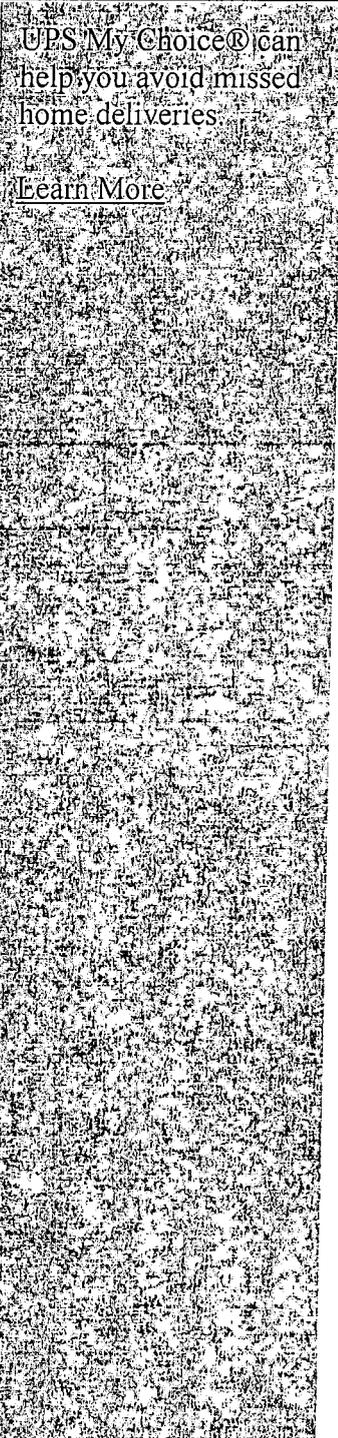
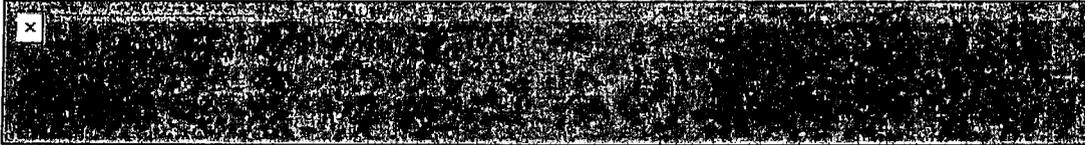
PS Form 3800, January 2001

See Reverse for Instructions

GC Exhibit 5(b)

Hayden, Frances

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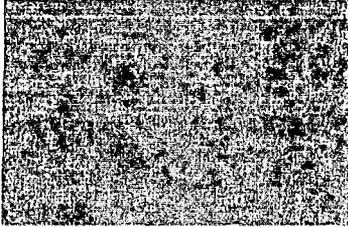
Tracking Number: [1ZA4F740NT99953750](#)
Delivery Date / Time: 20-December-2012 / 8:50 AM

Shipment Detail

Ship To:
Henry Rodriguez, Sr.
Henry Rodriguez, Sr.
320 LASSEN PARK CIR
SAN JOSE
CA
95136
US

Number of Packages: 1
UPS Service: NEXT DAY AIR
Shipment Type: Letter
Reference Number 1: Regional Attorney's Office
Reference Number 2: FHayden
Reference Number 3: 32-CA-068654/Compliance Spec/NOH

GC Exhibit 5(c)



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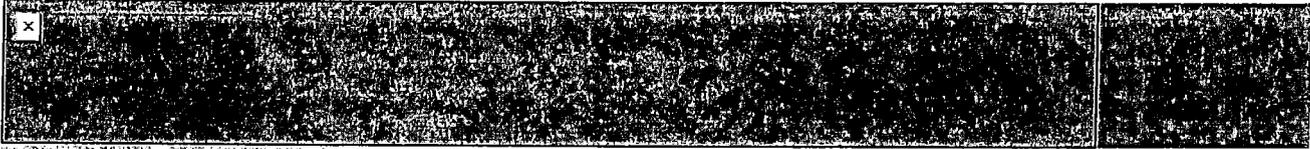
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To: Hayden, Frances
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Life's Connections Compliance Spec/NOH

Tracking Number: 1ZA4F740NT95191769
Delivery Date / Time: 20-December-2012 / 9:27 AM

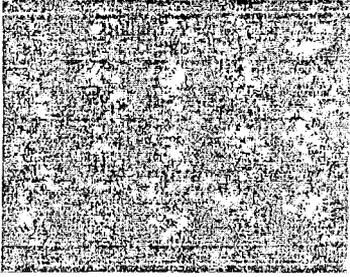
Delivery Location: RECEIVER
Signed by: RODRIGUEZ

Shipment Detail

Ship To:
Henry Rodriguez, Jr.
Life's Connections
6010 HELLYER AVE
SAN JOSE
CA
95138
US

Number of Packages: 1
UPS Service: NEXT DAY AIR
Shipment Type: Letter
Reference Number 1: Regional Attorney's Office
Reference Number 2: FHayden

GC Exhibit 5 (d)



Reference Number 3: 32-CA-068654/Compliance Spec/NOH

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YOUR LABEL NUMBER	SERVICE	STATUS OF YOUR ITEM	DATE & TIME	LOCATION	FEATURES
70012510000760319101		Delivered	December 21, 2012, 11:04 am	SAN JOSE, CA 95138	Certified Mail™
		Arrival at Unit	December 21, 2012, 7:53 am	SAN JOSE, CA 95111	
		Depart USPS Sort Facility	December 21, 2012	SAN JOSE, CA 95101	
		Processed through USPS Sort Facility	December 21, 2012, 3:16 am	SAN JOSE, CA 95101	

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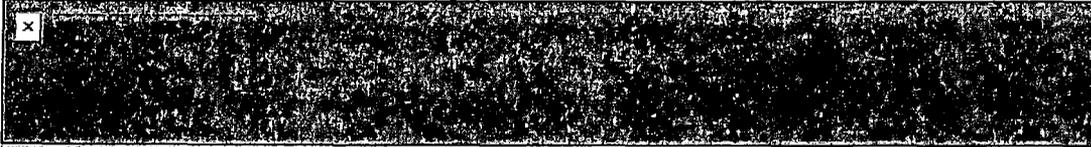
Total Postage & Fees: Henry Rodriguez, Jr.
 Life's Connections
 6010 Hellyer Avenue
 San Jose, CA 95138-1014

PS Form 3800, January 2001 See Reverse for Instructions

GC Exhibit 5(e)

Hayden, Frances

From: UPS Quantum View [auto-notify@ups.com]
Sent: Thursday, December 20, 2012 9:12 AM
To: Hayden, Frances
Subject: UPS Delivery Notification, Tracking Number 1ZA4F740NT95118375



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Important Delivery Information

Message from R-32: NLRB - CA:
Life's Connections Compliance Spec/NOH

Tracking Number: 1ZA4F740NT95118375

Delivery Date / Time: 20-December-2012 / 8:50 AM

Driver Release Location: screen

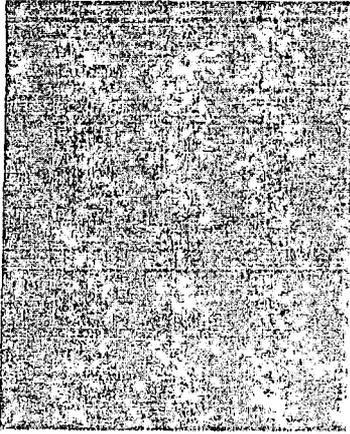
Shipment Detail

Ship To:
Henry Rodriguez, Jr.
Henry Rodriguez, Jr.
320 LASSEN PARK CIR
SAN JOSE
CA
95136
US

Number of Packages: 1
UPS Service: NEXT DAY AIR

Shipment Type: Letter

Reference Number 1: Regional Attorney's Office



**Reference
Number 2:**

FHayden

**Reference
Number 3:**

32-CA-068654/Compliance
Spec/NOH

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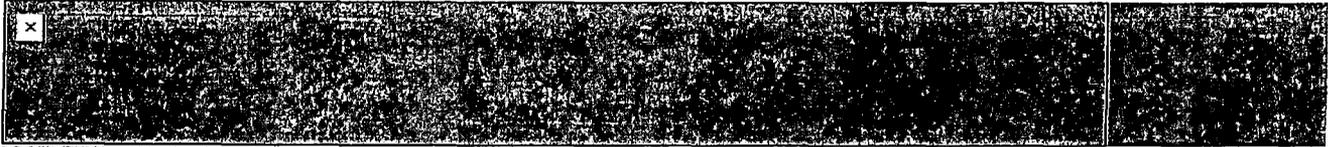
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Hayden, Frances

From: UPS Quantum View [auto-notify@ups.com]
Sent: Thursday, December 20, 2012 9:51 AM
To: Hayden, Frances
Subject: UPS Delivery Notification, Tracking Number 1ZA4F740NT96929587



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Message from R-32: NLRB - CA:
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Tracking Number: 1ZA4F740NT96929587
Delivery Date / Time: 20-December-2012 / 9:27 AM

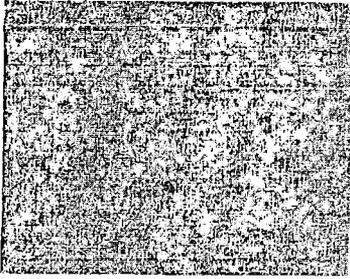
Delivery Location: RECEIVER
Signed by: RODRIGUEZ

Shipment Detail

Ship To:
Monica Pritchett
Life's Connections
6010 HELLYER AVE
SAN JOSE
CA
95138
US

Number of Packages: 1
UPS Service: NEXT DAY AIR
Shipment Type: Letter
Reference Number 1: Regional Attorney's Office
Reference Number 2: FHayden

GC Exhibit 5 (g)



Reference Number 3: 32-CA-068654/Compliance Spec/NOH

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YOUR LABEL NUMBER	SERVICE	STATUS OF YOUR ITEM	DATE & TIME	LOCATION	FEATURES
70012510000760319132		Delivered	December 21, 2012, 1:46 pm	HOLLISTER, CA 95023	Certified Mail™
		Arrival at Unit	December 21, 2012, 7:19 am	HOLLISTER, CA 95023	
		Depart USPS Sort Facility	December 20, 2012	SAN JOSE, CA 95101	
		Processed through USPS Sort Facility	December 20, 2012, 11:20 pm	SAN JOSE, CA 95101	

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Return Receipt Fee (Endorsement Required)		
Restricted Delivery Fee (Endorsement Required)		
Total Postage & Fees		

Sent To: **Monica Pritchett**
 2381 Fairhaven Drive
 Hollister, CA 95023-8017

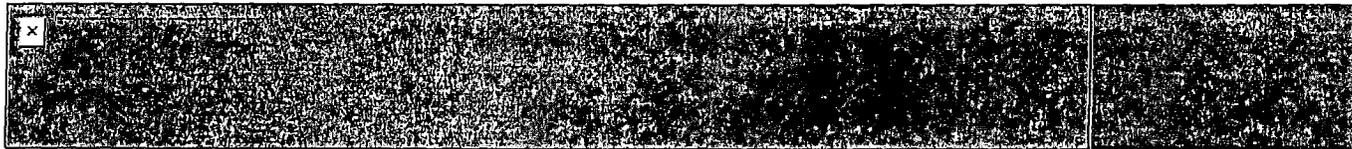
Street, Apt No or PO Box No
 City, State, ZIP+4

PS Form 3800, January 2001 See Reverse for Instructions

GC Exhibit 5(h)

Hayden, Frances

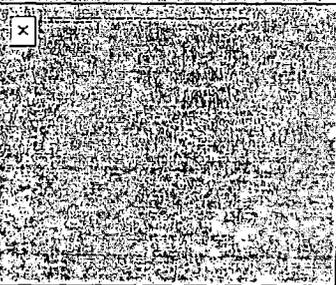
From: UPS Quantum View [auto-notify@ups.com]
Sent: Thursday, December 20, 2012 1:42 PM
To: Hayden, Frances
Subject: UPS Delivery Notification, Tracking Number 1ZA4F740NT96381392



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Message from R-32: NLRB - CA:
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Tracking Number: [1ZA4F740NT96381392](#)
Delivery Date / Time: 20-December-2012 / 1:15 PM

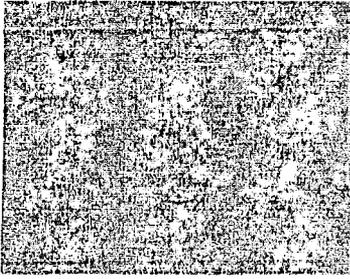
Delivery Location: RESIDENTIAL
Signed by: PRICKETT

Shipment Detail

Ship To:
Monica Pritchett
Monica Pritchett
2381 FAIRHAVEN DR
HOLLISTER
CA
95023
US

Number of Packages: 1
UPS Service: NEXT DAY AIR
Shipment Type: Letter
Reference Number 1: Regional Attorney's Office
Reference Number 2: FHayden

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Reference Number 3: 32-CA-068654/Compliance Spec/NOH

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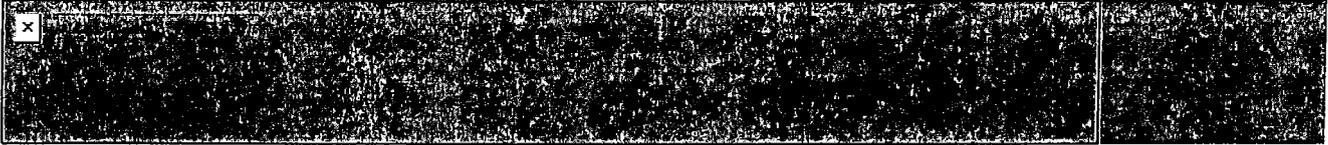
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Hayden, Frances

From: UPS Quantum View [auto-notify@ups.com]
Sent: Thursday, December 20, 2012 9:51 AM
To: Hayden, Frances
Subject: UPS Delivery Notification, Tracking Number 1ZA4F740NT99389807

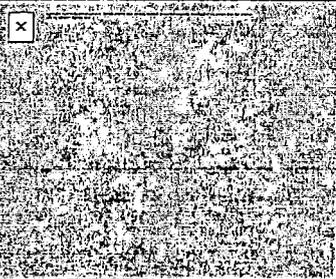


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Message from R-32: NLRB - CA:
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Tracking Number: 1ZA4F740NT99389807
Delivery Date / Time: 20-December-2012 / 9:27 AM

Delivery Location: RECEIVER
Signed by: RODRIGUEZ

Shipment Detail

Ship To:
Christopher Pritchett
Life's Connections
6010 HELLYER AVE
SAN JOSE
CA
95138
US

Number of Packages: 1
UPS Service: NEXT DAY AIR
Shipment Type: Letter
Reference Number 1: Regional Attorney's Office
Reference Number 2: FHayden

GC Exhibit 5(j)



Reference Number 3: 32-CA-068654/Compliance Spec/NOH

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70012510000760319156		Delivered	December 21, 2012, 1:46 pm	HOLLISTER, CA 95023	Certified Mail™
		Arrival at Unit	December 21, 2012, 7:19 am	HOLLISTER, CA 95023	
		Depart USPS Sort Facility	December 20, 2012	SAN JOSE, CA 95101	
		Processed through USPS Sort Facility	December 20, 2012, 11:20 pm	SAN JOSE, CA 95101	

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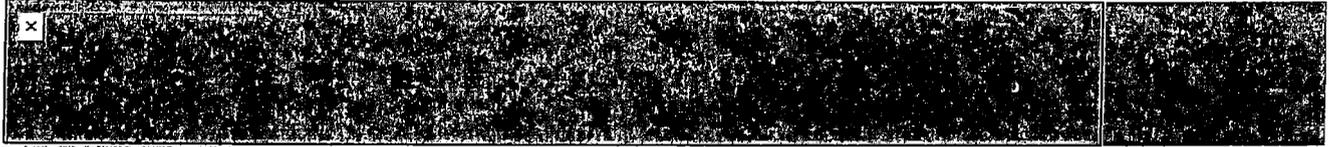
Postage	\$	Postmark Here
Certified Fee		
Return Receipt Fee (Endorsement Required)		
Restricted Delivery Fee (Endorsement Required)		
Total Postage &		
Sent To: Christopher Pritchett 2381 Fairhaven Drive Hollister, CA 95023-8017		
Street, Apt. No., or PO Box No. _____ City, State, ZIP+4 _____		

PS Form 3800, January 2001. See Reverse for Instructions

GC Exhibit 5(K)

Hayden, Frances

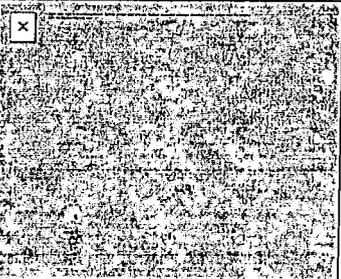
From: UPS Quantum View [auto-notify@ups.com]
Sent: Thursday, December 20, 2012 1:42 PM
To: Hayden, Frances
Subject: UPS Delivery Notification, Tracking Number 1ZA4F740NT99630812



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Message from R-32: NLRB - CA:
Life's Connections Compliance Spec/NOH

Tracking Number: 1ZA4F740NT99630812
Delivery Date / Time: 20-December-2012 / 1:15 PM

Delivery Location: RESIDENTIAL
Signed by: PRICKETT

Shipment Detail

Ship To:
Christopher Pritchett
Christopher Pritchett
2381 FAIRHAVEN DR
HOLLISTER
CA
95023
US

Number of Packages: 1
UPS Service: NEXT DAY AIR
Shipment Type: Letter
Reference Number 1: Regional Attorney's Office
Reference Number 2: FHayden

GC Exhibit 5 (1)



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Hayden, Frances

From: Gary Clifford [gary@polarislawgroup.com]
To: Hayden, Frances
Sent: Wednesday, December 19, 2012 6:15 PM
Subject: Read. BPS.32-CA-068654.Compliance Specification and Notice of Hearing 12-19-12

Your message was read on Wednesday, December 19, 2012 9:14:58 PM (GMT-05:00) Eastern Time (US & Canada)

GC Exhibit 5 (m)



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Agency Website: www.nlr.gov
Telephone: (510)637-3300
Fax: (510)637-3315

January 25, 2013

Agent's Direct Dial: (510) 637-3255

MR. HENRY RODRIGUEZ SR.
MR. HENRY RODRIGUEZ, JR.
LIFE'S CONNECTIONS
6010 HELLYER AVE
SAN JOSE, CA 95138-1014

Re: Life's Connections
Case 32-CA-068654
Case 32-CA-068656

Dear Messrs. Rodriguez, Sr., and Rodriguez, Jr.,

On December 19, 2012, Regional Director William A. Baudler issued a Compliance Specification and Notice of Hearing in the above-captioned cases. In the Compliance Specification and Notice of Hearing, you were advised that, pursuant to Sections 102.56 of the National Labor Relations Board's Rules and Regulations, you must file an Answer to the Compliance Specification and Notice of Hearing, and that the Answer must be received by this office on or before January 9, 2013. This deadline has passed, but the Region has not received your Answer.

As you were also advised, if no answer is filed or if an answer is filed in an untimely manner, the Board may find, pursuant to a Motion for Default Judgment, that the allegations of the Compliance Specification and Notice of Hearing are true. Accordingly, pursuant to Section 10652.1 of the National Labor Relations Board Casehandling Manual Part Three (Compliance Proceedings), be advised that the Region is granting you a final one week extension of time from the date of this letter to file your Answer to the Compliance Specification and Notice of Hearing. If an answer is not received in this office by the close of business on **February 1, 2013**, a Motion for Default Judgment will be filed with the Board in Washington, D.C.

Very truly yours,

D. Criss Parker
Counsel for the General Counsel

GC Exhibit 6 (a)



UNITED STATES GOVERNMENT
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STE 300N
OAKLAND, CA 94612-5224

Agency Website: www.nlr.gov
Telephone: (510)637-3300
Fax: (510)637-3315

January 25, 2013

Agent's Direct Dial: (510) 637-3255

MR. HENRY RODRIGUEZ SR.
MR. HENRY RODRIGUEZ, JR.
LIFE'S CONNECTIONS
320 LASSEN PARK CIRCLE
SAN JOSE, CA 95136

Re: Life's Connections
Case 32-CA-068654
Case 32-CA-068656

Dear Messrs. Rodriguez, Sr., and Rodriguez, Jr.,

On December 19, 2012, Regional Director William A. Baudler issued a Compliance Specification and Notice of Hearing in the above-captioned cases. In the Compliance Specification and Notice of Hearing, you were advised that, pursuant to Sections 102.56 of the National Labor Relations Board's Rules and Regulations, you must file an Answer to the Compliance Specification and Notice of Hearing, and that the Answer must be received by this office on or before January 9, 2013. This deadline has passed, but the Region has not received your Answer.

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Very truly yours,

D. Criss Parker
Counsel for the General Counsel

GC Exhib. 7 6 (b)



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MS. MONICA PRITCHETT
MR. CHRISTOPHER PRITCHETT
LIFE'S CONNECTIONS
2381 FAIRHAVEN DRIVE
HOLLISTER, CA 95023-8017

Re: Life's Connections
Case 32-CA-068654
Case 32-CA-068656

Dear Mr. Pritchett and Ms. Pritchett:

On December 19, 2012, Regional Director William A. Baudler issued a Compliance Specification and Notice of Hearing in the above-captioned cases. In the Compliance Specification and Notice of Hearing, you were advised that, pursuant to Sections 102.56 of the National Labor Relations Board's Rules and Regulations, you must file an Answer to the Compliance Specification and Notice of Hearing, and that the Answer must be received by this office on or before January 9, 2013. This deadline has passed, but the Region has not received your Answer.

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Very truly yours,

D. Criss Parker
Counsel for the General Counsel

GC Exhibit 6(c)



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Fax: (510)637-3315

January 25, 2013

Agent's Direct Dial: (510) 637-3255

MR. GARY CLIFFORD, ESQ.
POLARIS LAW GROUP, LLP
501 SAN BENITO STREET
SUITE 200
HOLLISTER, CA 95023-3903

Re: Life's Connections
Case 32-CA-068654
Case 32-CA-068656

Dear Mr. Clifford:

Although you have not filed a Notice of Appearance in these matters, I am advising you of the following in the event you represent or intend to represent Life's Connections and/or Christopher Pritchett and/or Monica Pritchett.

On December 19, 2012, Regional Director William A. Baudler issued a Compliance Specification and Notice of Hearing in the above-captioned cases. In the Compliance Specification and Notice of Hearing, you were advised that, pursuant to Sections 102.56 of the National Labor Relations Board's Rules and Regulations, you must file an Answer to the Compliance Specification and Notice of Hearing, and that the Answer must be received by this office on or before January 9, 2013. This deadline has passed, but the Region has not received your Answer.

As you were also advised, if no answer is filed or if an answer is filed in an untimely manner, the Board may find, pursuant to a Motion for Default Judgment, that the allegations of the Compliance Specification and Notice of Hearing are true. Accordingly, pursuant to Section 10652.1 of the National Labor Relations Board Casehandling Manual Part Three (Compliance Proceedings), be advised that the Region is granting you a final one week extension of time from the date of this letter to file your Answer to the Compliance Specification and Notice of Hearing. If an answer is not received in this office by the close of business on **February 1, 2013**, a Motion for Default Judgment will be filed with the Board in Washington, D.C.

Very truly yours,

A handwritten signature in black ink, appearing to read "D. Criss Parker".

D. Criss Parker
Counsel for the General Counsel

GC Exhibit 6 (d)

Conterno-Regan, Joan M.

From: Conterno-Regan, Joan M.
Sent: Friday, January 25, 2013 4:47 PM
To: 'hnyro@aol.com'
Cc: Parker, D. Criss; Valencia, Hokulani
Subject: Life's Connections 32-CA-068654 and 32-CA-068656
Attachments: Rodrigues Jr and Sr (2).docx; Rodrigues Jr and Sr (3).docx

Mr. Rodrigues Sr., and Mr. Rodrigues Jr.,

Please see the attachments.

Thank you,

Joan Conterno-Regan
Assistant Compliance Officer
National Labor Relations Board
(510) 637-3310



UNITED STATES GOVERNMENT
NATIONAL LABOR RELATIONS BOARD

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STE 300N
OAKLAND, CA 94612-5224

Agency Website: www.nlr.gov
Telephone: (510)637-3300
Fax: (510)637-3315

January 25, 2013

Agent's Direct Dial: (510) 637-3255

MR. HENRY RODRIGUEZ SR.
MR. HENRY RODRIGUEZ, JR.
LIFE'S CONNECTIONS
320 LASSEN PARK CIRCLE
SAN JOSE, CA 95136

Re: Life's Connections
Case 32-CA-068654
Case 32-CA-068656

Dear Messrs. Rodriguez, Sr., and Rodriguez, Jr.,

On December 19, 2012, Regional Director William A. Baudler issued a Compliance Specification and Notice of Hearing in the above-captioned cases. In the Compliance Specification and Notice of Hearing, you were advised that, pursuant to Sections 102.56 of the National Labor Relations Board's Rules and Regulations, you must file an Answer to the Compliance Specification and Notice of Hearing, and that the Answer must be received by this office on or before January 9, 2013. This deadline has passed, but the Region has not received your Answer.

As you were also advised, if no answer is filed or if an answer is filed in an untimely manner, the Board may find, pursuant to a Motion for Default Judgment, that the allegations of the Compliance Specification and Notice of Hearing are true. Accordingly, pursuant to Section 10652.1 of the National Labor Relations Board Casehandling Manual Part Three (Compliance Proceedings), be advised that the Region is granting you a final one week extension of time from the date of this letter to file your Answer to the Compliance Specification and Notice of Hearing. If an answer is not received in this office by the close of business on **February 1, 2013**, a Motion for Default Judgment will be filed with the Board in Washington, D.C.

Very truly yours,

D. Criss Parker
Counsel for the General Counsel



UNITED STATES GOVERNMENT
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Fax: (510)637-3315

January 25, 2013

Agent's Direct Dial: (510) 637-3255

MR. HENRY RODRIGUEZ SR.
MR. HENRY RODRIGUEZ, JR.
LIFE'S CONNECTIONS
6010 HELLYER AVE
SAN JOSE, CA 95138-1014

Re: Life's Connections
Case 32-CA-068654
Case 32-CA-068656

Dear Messrs. Rodriguez, Sr., and Rodriguez, Jr.,

On December 19, 2012, Regional Director William A. Baudler issued a Compliance Specification and Notice of Hearing in the above-captioned cases. In the Compliance Specification and Notice of Hearing, you were advised that, pursuant to Sections 102.56 of the National Labor Relations Board's Rules and Regulations, you must file an Answer to the Compliance Specification and Notice of Hearing, and that the Answer must be received by this office on or before January 9, 2013. This deadline has passed, but the Region has not received your Answer.

As you were also advised, if no answer is filed or if an answer is filed in an untimely manner, the Board may find, pursuant to a Motion for Default Judgment, that the allegations of the Compliance Specification and Notice of Hearing are true. Accordingly, pursuant to Section 10652.1 of the National Labor Relations Board Casehandling Manual Part Three (Compliance Proceedings), be advised that the Region is granting you a final one week extension of time from the date of this letter to file your Answer to the Compliance Specification and Notice of Hearing. If an answer is not received in this office by the close of business on **February 1, 2013**, a Motion for Default Judgment will be filed with the Board in Washington, D.C.

Very truly yours,

D. Criss Parker
Counsel for the General Counsel

***** -COMI JOURNAL- ***** DATE JAN-25-2013 ***** TIME 17:10 *****

MODE = MEMORY TRANSMISSION

START=JAN-25 17:08

END=JAN-25 17:10

FILE NO.=982

STN NO.	COMM.	ONE-TOUCH/ ABBR NO.	STATION NAME/TEL NO.	PAGES	DURATION
001	OK		918316340333	002/002	00:00:34

-NLRB REGION 32 -

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Facsimile Cover Sheet

To: Gary Clifford
Company: Polaris Law Group
Phone: 831-531-4211
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From: D. Criss Parker
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Date: January 25, 2013

Pages including this cover page: 2

Comments:

GC Exhibit 8(a)

MODE = MEMORY TRANSMISSION

START=JAN-25 17:10

END=JAN-25 17:11

FILE NO.=983

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001	OK		914088548100	002/002	00:00:57

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To: Gary Clifford
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Date: January 25, 2013
Pages including this cover page: 2

Comments:

GC Exhibit 8 (b)

**UNITED STATES OF AMERICA
BEFORE THE NATIONAL LABOR RELATIONS BOARD
REGION 32**

**HENRY RODRIGUEZ, SR., HENRY RODRIGUEZ, JR.,
MONICA PRITCHETT, and CHRISTOPHER
PRITCHETT, a CALIFORNIA GENERAL
PARTNERSHIP, d/b/a LIFE'S CONNECTIONS**

Case(s) 32-CA-068654

and

CHRIS MORA, an Individual

and

**HENRY RODRIGUEZ, SR., HENRY RODRIGUEZ, JR.,
MONICA PRITCHETT, and CHRISTOPHER
PRITCHETT, a CALIFORNIA GENERAL
PARTNERSHIP, d/b/a LIFE'S CONNECTIONS**

32-CA-068656

and

CONSTANCE SIFTON, an Individual

**AFFIDAVIT OF SERVICE OF MOTION TO TRANSFER AND CONTINUE CASE BEFORE
THE BOARD AND MOTION FOR DEFAULT JUDGMENT**

I, the undersigned employee of the National Labor Relations Board, state under oath that on **February 6, 2013**, I served the above-entitled document(s) by post-paid regular mail, United Parcel Service, and/or electronically, upon the following persons, addressed to them at the following addresses:

<p>Henry Rodriguez, Sr., Executive Director Life's Connections 6010 Hellyer Avenue San Jose, CA 95138-1014 VIA E-MAIL: hnrory@aol.com VIA UPS OVERNIGHT SERVICE VIA U.S. REGULAR MAIL</p>	<p>Henry Rodriguez, Sr. 320 Lassenpark Circle San Jose, CA 95136-2130 VIA E-MAIL: hnrory@aol.com VIA UPS OVERNIGHT SERVICE VIA U.S. REGULAR MAIL</p>
<p>Henry Rodriguez, Jr. Life's Connections 6010 Hellyer Avenue San Jose, CA 95138-1014 VIA E-MAIL: henryrodriguez49@yahoo.com VIA UPS OVERNIGHT SERVICE VIA U.S. REGULAR MAIL</p>	<p>Henry Rodriguez, Jr. 320 Lassenpark Circle San Jose, CA 95136-2130 VIA E-MAIL: henryrodriguez49@yahoo.com VIA UPS OVERNIGHT SERVICE VIA U.S. REGULAR MAIL</p>

<p>Monica Pritchett Life's Connections 6010 Hellyer Avenue San Jose, CA 95138-1014 VIA E-MAIL: <u>monicapritchett@yahoo.com</u> VIA UPS OVERNIGHT SERVICE VIA U.S. REGULAR MAIL</p>	<p>Monica Pritchett 2381 Fairhaven Drive Hollister, CA 95023-8017 VIA E-MAIL: <u>monicapritchett@yahoo.com</u> VIA UPS OVERNIGHT SERVICE VIA U.S. REGULAR MAIL</p>
<p>Christopher Pritchett Life's Connections 6010 Hellyer Avenue San Jose, CA 95138-1014 VIA UPS OVERNIGHT SERVICE VIA U.S. REGULAR MAIL</p>	<p>Christopher Pritchett 2381 Fairhaven Drive Hollister, CA 95023-8017 VIA UPS OVERNIGHT SERVICE VIA U.S. REGULAR MAIL</p>
<p>Gary J. Clifford Polaris Law Group, LLP 501 San Benito Street, Suite 200 Hollister, CA 95023 COURTESY COPY SENT VIA E-MAIL: <u>gary@polarislawgroup.com</u></p>	<p>Christopher Mora 551 Arbour Lane Hollister, CA 95023-7101 VIA E-MAIL: <u>morason831@gmail.com</u></p>
<p>Office of the Solicitor National Labor Relations Board 1099 14th Street, N.W., Suite 11610 Washington, DC 20005 VIA E-FILE</p>	<p>Constance A. Sifton 100 S Coalinga Street Apartment C Coalinga, CA 93210-2404 VIA E-MAIL: <u>connies89@hotmail.com</u></p>

February 6, 2013

Date

Frances Hayden, Designated Agent of NLRB

Name



Signature