

UNITED STATES OF AMERICA  
BEFORE THE NATIONAL LABOR RELATIONS BOARD  
REGION SIX

PITTSBURGH ATHLETIC ASSOCIATION

and

Cases 6-CA-105460 and  
6-CA-105461

UNITE HERE LOCAL 57

**MOTION TO CORRECT MOTION FOR DEFAULT JUDGMENT**

Counsel for the Acting General Counsel, pursuant to Sections 102.24, 102.26 and 102.50 of the Board's Rules and Regulations, Series 8, as amended, makes this motion to correct an inadvertent error contained in the Motion for Default filed on October 22, 2013. In support of this Motion, Counsel for the Acting General Counsel submits that paragraph 1 of the Motion for Default should be corrected to read as follows:

1. On August 29, 2013, a Consolidated Complaint and Notice of Hearing, a copy of which is attached hereto as Exhibit A, issued in the instant matter alleging that Respondent had engaged in unfair labor practices affecting commerce within the meaning of Sections 8(a)(1) and (5) and 2(6) and (7) of the Act by failing to continue in effect all terms and conditions of the collective bargaining agreement by failing to remit to the exclusive collective-bargaining representative of its employees dues and fees deducted from unit employees' wages, and by unreasonably delaying in furnishing the Union with the information requested by it as described in paragraph 14 of the Consolidated Complaint and Notice of Hearing.

Dated at Pittsburgh, Pennsylvania, this 23<sup>rd</sup> day of October 2014.

Respectfully submitted,



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Clifford E. Spungen  
Counsel for the Acting General Counsel

NATIONAL LABOR RELATIONS BOARD  
Region 6  
William S. Moorhead Federal Building  
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Pittsburgh, Pennsylvania 15222  
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AFFIDAVIT OF SERVICE OF: MOTION TO CORRECT MOTION FOR DEFAULT  
JUDGMENT

I, the undersigned employee of the National Labor Relations Board, being duly sworn, say that on October 23, 2013, I served the above-entitled document(s) by electronic mail, as noted below, upon the following persons, addressed to them at the following addresses:

PITTSBURGH ATHLETIC ASSOCIATION  
JOSEPH DENGLER , GENERAL  
MANAGER  
4215 5TH AVE  
PITTSBURGH, PA 15213-3599  
[joe.dengler@paaclub.org](mailto:joe.dengler@paaclub.org)

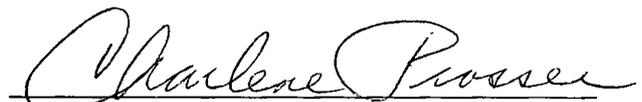
JOSEPH D. SHAULIS , ATTORNEY  
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500 LAW & FINANCE BUILDING  
429 4TH AVE  
PITTSBURGH, PA 15219-1500  
[jdshaulis@gmail.com](mailto:jdshaulis@gmail.com)

October 23, 2013

Date

Charlene Prosser,  
Designated Agent of NLRB

Name

  
Signature