



United States Government

NATIONAL LABOR RELATIONS BOARD
1099 14th STREET NW
WASHINGTON DC 20570

September 26, 2014

John Raudabaugh
Bruce N. Cameron
c/p National Right to Work Legal
Defense and Education Foundation, Inc.
8001 Braddock Road, Suite 600
Springfield, VA 22160

Re: Pacific Lutheran University
Case 19-RC-102521

Dear Counsels:

This letter acknowledges receipt of *Amicus Curiae* National Right to Work Legal Defense and Education Foundation's Notice of Supplemental Authority and Supplemental Brief filed on September 24, 2014.

Pursuant to *Reliant Energy*, 339 NLRB 66 (2003), a party may bring to the Board's attention pertinent and significant authorities that come to a party's attention after the party's brief has been filed. A party may promptly advise the Executive Secretary, by letter, with a copy to all other parties. The letter should set forth the case citations and state the reasons for them, and refer to the pages, paragraphs, and lines of the brief to which the citations apply. The body of the letter must not exceed 350 words.

The National Right to Work Legal Defense and Education Foundation's Supplemental Brief is not a letter, exceeds the 350 word limit, and does not indicate where in the brief the citation applies. Accordingly, the Supplemental Brief cannot be forwarded to the Board for consideration. The National Right to Work Legal Defense and Education Foundation may resubmit a letter that complies with all of the requirements of *Reliant Energy*.

Very truly yours,

A handwritten signature in black ink, appearing to read "Farah Z. Qureshi", written over a horizontal line.

Farah Z. Qureshi
Associate Executive Secretary

cc: Parties