

CERTIFICATE OF SERVICE

I hereby certify that on October 7, 2014, I electronically filed a letter to Gary Shinnars, Executive Secretary of the NLRB, containing a *Reliant Energy* notice of supplemental authority on behalf of *Amicus Curiae* National Right to Work Legal Defense and Education Foundation, Inc., and I e-mailed the same to the following:

Paul Drachler (SEIU Local 925)

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Warren Martin (Pacific Lutheran)

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Ronald Hooks (Regional Director, NLRB)

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/s/ Bruce N. Cameron