

UNITED STATES OF AMERICA  
BEFORE THE NATIONAL LABOR RELATIONS BOARD  
REGION 14, SUBREGION 17

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AMERICAN FEDERATION OF  
TELEVISION AND RADIO  
ARTISTS (AFTRA) KANSAS  
CITY LOCAL,

Charging Party,

AND

Case No.: 17-CA-077657

MEREDITH CORPORATION,

Respondent.

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MASUD LABOR LAW GROUP  
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**RESPONDENT'S RESPONSE TO THE BOARD'S NOTICE  
TO SHOW CAUSE AND RESPONSE TO STATEMENT  
IN SUPPORT OF MOTION FOR SUMMARY JUDGMENT**

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On December 10, 2014, the Board issued a Decision essentially confirming its prior certification of the Screen Actors Guild – American Federation of Television and Radio Artists (SAG-AFTRA), Kansas City Local (Union), as the exclusive bargaining representative of the employees in the following alleged appropriate unit:

All announcers, anchors, reporters/newscasters, directors, chief directors, news photographers, multi-media journalists, news editors, news producers, and production assistants. Excluding all office clerical employees, salespersons, guards, professional and supervisory employees as defined in the Act, and all other employees.

The Board's Decision also included a Notice to Show Cause on or before January 26, 2015, as to why the Board should not grant the General Counsel's Motion for Summary Judgment in this matter which was originally filed on May 2, 2012. However, as a part of its December 10, 2014, Decision, the Board also granted the General Counsel leave to amend its original Complaint on or before December 22, 2014, such that it might conform to the current state of the evidence, with the Respondent's answer to the Amended Complaint due on or before January 5, 2015. Yet, the General Counsel failed to amend the Complaint as of December 22, 2014. The General Counsel did not amend its Complaint until January 22, 2015. Indeed, the General Counsel has been forced to file a companion Motion for Leave to Amend its Complaint *after* the December 22, 2014, deadline.

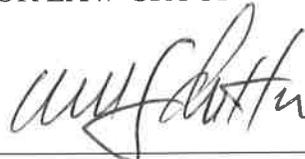
Of course, under the Board's rules, Respondent has 14 days in which to file an Answer to the Amended Complaint, assuming the Board grants the General Counsel's Motion for Leave to Amend its Complaint. Yet, according to the Board's January 26, 2015, deadline referenced in its December 10, 2014, Decision, Respondent is supposed to show cause why the General Counsel's Motion for Summary Judgment should not be granted on a Complaint to which Respondent need not yet answer. In other words, because the General Counsel has missed the December 22, 2014,

deadline referenced in the Board's earlier Decision, the "cart" (the identification of cause as to why the Board should not grant summary judgment) is now placed before the "horse" (Respondent's Answer to the Amended Complaint). This obviously violates the Board's December 10, 2014, Decision and Order and works a prejudice to Respondent.

Accordingly, Respondent requests that the General Counsel's Motion for Summary Disposition be held in abeyance pending Respondent's Answer to the Amended Complaint and that the Board provide a reasonable period of time thereafter by which Respondent might identify cause, in writing, as to why the Board should not grant the General Counsel's Motion for Summary Judgment.

Respectfully submitted,

MASUD LABOR LAW GROUP



Dated: January 26, 2015

By: \_\_\_\_\_

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**CERTIFICATION OF SERVICE**

This is to certify that on January 26, 2015, a copy of Respondent's Response to the Board's Notice to Show Cause and Response to Statement in Support of Motion for Summary Judgment was served by e-mail on:

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Respectfully submitted,

MASUD LABOR LAW GROUP



Dated: January 26, 2015

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