



United States Government

NATIONAL LABOR RELATIONS BOARD

Region 22

20 Washington Place, 5th Floor

Newark, NJ 07102-3110

April 14, 2015

Mr. Gary Shinnars
Executive Secretary
Office of the Executive Secretary
National Labor Relations Board
1009 14th Street, N.W.
Washington, DC 20570

Re: Benjamin H. Realty Corp. and
Residential Construction and General
Service Workers, Laborers, Local 55
Cases 22-CA-110689 and 22-RC-087792

Dear Mr. Shinnars:

Please accept this letter addressing the Employer/Respondent Benjamin H. Realty Corp.'s April 9, 2015 letter Reply. The Region and Counsel for the General Counsel have previously fully responded to the arguments raised by the Employer/Respondent in its April 9, 2015 submission. Accordingly, the Region and General Counsel hereby rely on their letter briefs of March 19 and April 3, 2015 in support of their position and do not intend to file additional responsive documents.

For the reasons set forth in the Region's and General Counsel's referenced letter briefs, it is respectfully urged that the Employer's Motion to Reopen the Record and Motion for

Reconsideration be denied and that the Board grant Counsel for the General Counsel's Motion Seeking Leave to Amend the Complaint in this matter to allege a refusal to bargain by Respondent.

Respectfully Submitted,

s/ Julie L. Kaufman
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**UNITED STATES OF AMERICA
BEFORE THE NATIONAL LABOR RELATIONS BOARD
REGION 22**

BENJAMIN H REALTY CORP

and

**Cases 22-CA-110689
22-RC-087792**

**RESIDENTIAL CONSTRUCTION AND
GENERAL SERVICE WORKERS LABORERS
LOCAL 55**

CERTIFICATE OF SERVICE

This is to certify that on April 14, 2015, copies of the Counsel for the General Counsel's and the Region's Letter Response to **Benjamin H. Realty Corp.'s April 9, 2015 Reply in Cases 22-RC-087792 and 22-CA-110689** was served by email and regular mail as follows:

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Dated at Newark, New Jersey this 14th day of April, 2015.

s/ Julie L. Kaufman

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