

HARRIS BEACH PLLC
ATTORNEYS AT LAW

August 1, 2016

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VIA FEDERAL EXPRESS

National Labor Relations Board
1015 Half Street SE
Washington, D.C. 20570-0001

**RE: Williamsville Suburban, LLC and
Sheridan Manor, LLC and
1199 SEIU United Healthcare Workers East
Cases 03-CA-167978 and 03-CA-168008**

Dear National Labor Board Chair and Members:

Please accept this submission on behalf of the Respondents, Williamsville Suburban, LLC and Sheridan Manor, LLC, in the above-reference matters.

Contrary to the allegations in the Order Consolidating Cases, Consolidating Complaint and Notice of Hearing in these matters, it is the Respondents' position that it did not materially default on the terms of the Settlement Agreements in these cases. In fact, upon information and belief, Respondents have provided information responsive to the Union's information requests of December 15, 2015, January 4, 2016 and January 12, 2016, and have posted the required notices. E-mail exhibits attached to General Counsel's papers confirm that in fact information was provided to the Union pursuant to the Settlement Agreements.

Accordingly, Respondents respectfully request that the Board deny General Counsel's motion in its entirety.

Very truly yours,

HARRIS BEACH PLLC



Edward A. Trevvett

Cc: Theresa Lyman - Administrative Organizer
2421 Main Street, Suite 100
Buffalo, NY 14214

Alicia E. Pender, Esq.
Counsel for the General Counsel

UNITED STATES OF AMERICA
NATIONAL LABOR RELATIONS BOARD

WILLIAMSVILLE SUBURBAN, LLC

AFFIDAVIT OF MAILING

and

CASES 03-CA-167978
and 03-CA-168008

SHERIDAN MANOR

and

1199 SEIU UNITED HEALTHCARE
WORKERS EAST

STATE OF NEW YORK)
COUNTY OF MONROE) ss:

ANGELA CLARKE being duly sworn, deposes and says that she resides in the Town of Irondequoit, State of New York, that she is over the age of eighteen years and is an administrative assistant in the law firm of Harris Beach PLLC. That on the 1st day of August 2016, before 6:00 p.m., at the Town of Pittsford, County of Monroe and State of New York, deponent served a copy of the foregoing **submission on behalf of Williamsville Suburban, LLC and Sheridan manor, LLC**, addressed to the address designated by the individual for that purpose, by depositing a true copy thereof, properly and securely enclosed in a sealed wrapper, to be stamped with full postage by an employee of GLC and to be placed in a U.S. Postal depository maintained under the exclusive care and custody of the United States Postal Service within the state, directed to:

Theresa Lyman – Administrative Organizer
2421 Main Street, Suite 100
Buffalo, NY 14214

Alicia E. Pender, Esq.
Counsel for the General Counsel
NLRB, Region 3, Albany Resident Office
11A Clinton Square, Room 342
Albany, NY 12207


ANGELA CLARKE

Sworn to before me this
1 day of August 2016


Notary Public

KRISTY A. MCLAUGHLIN
Notary Public, State of New York
Registration #01MC6207387
Qualified in Ontario County
Commission Expires June 15, 2017

KRISTY A. MCLAUGHLIN
Notary Public, State of New York
Registration #01MC820787
Qualified in Ontario County
Commission Expires June 18, 20