

**UNITED STATES OF AMERICA
NATIONAL LABOR RELATIONS BOARD
REGION 1**

READYJET, INC.	:	
	:	Cases:
Respondent	:	01-CA-132326
	:	01-CA-140878
and	:	01-CA-155263
	:	01-CA-159503
32 BJ SEIU NEW ENGLAND 615	:	01-CA-159509
	:	
Charging Party	:	

**READYJET’S RESPONSE TO COUNSEL FOR THE GENERAL COUNSEL’S
MOTION TO CORRECT CERTAIN OMISSIONS FROM THE ALJ’S DECISION AND
RECOMMENDED ORDER**

Pursuant to Section 102.24(a) of the Rules and Regulations of the National Labor Relations Board, as amended, Respondent, ReadyJet, hereby responds to the General Counsel’s Motion to Correct Certain Omissions from the Administrative Law Judge’s Decision and Order issued in the above-captioned matter on October 12, 2016.

1(a). Denied. The Conclusions of Law as written by the ALJ speak for itself. Moreover, ReadyJet’s Exceptions filed on November 9, 2016 assert error by the ALJ in his Conclusions of Law and Remedy.

1(b). Denied. The Order as written by the ALJ speak for itself. Moreover, Readyjet’s Exceptions filed on November 9, 2016 assert error by the ALJ in his Conclusions of Law and Remedy.

1(c). Denied. The Order speaks for itself. Moreover, ReadyJet’s Exceptions filed on November 9, 2016 assert error by the ALJ in his Conclusions of Law and Remedy.

1(d). Denied. The Cease and Desist Order speaks for itself. Moreover, ReadyJet's Exceptions filed on November 9, 2016 assert error by the ALJ in his Conclusions of Law and Remedy.

2(a). Denied. The Remedy speaks for itself. Moreover, ReadyJet's Exceptions filed on November 9, 2016, assert error by the ALJ in his Conclusions of Law and Remedy. Also, Luis Oliva is no longer employed by ReadyJet.

2(b). Denied. There is no Order at item (i) or item (j). By way of further answer, the Order at 2(i) and 2(j) speaks for itself. It is denied that the Order contains inadvertent omissions. Moreover, ReadyJet filed Exceptions on November 9, 2016, asserting error by the ALJ in his Order.

2(c). Denied. The Remedy and Order speak for themselves. Moreover, ReadyJet filed Exceptions on November 9, 2016, asserting error by the ALJ in his Remedy and Order.

2(d). Denied. If General Counsel finds error with the ALJ's Decision and Proceedings, he must file Exceptions. Also, Luis Oliva is no longer employed by ReadyJet. ReadyJet denies the footnote to 2(d). Moreover, ReadyJet's Exceptions filed on November 9, 2016 assert error by the ALJ in his Conclusions of Law and Remedy.

3(a). Admitted.

3(b). Denied. No Exhibit 1 was attached.

3(c). Denied.

4. ReadyJet filed Exceptions on November 9, 2016.

5. ReadyJet's response to the General Counsel's Motion to Correct is being filed within such time as not to delay the proceeding.

6. General Counsel's Motion to Correct Certain Omissions are actually Exceptions to the ALJ's Decision and Proceedings and as such were required to have been filed as Exceptions following all rules and regulations relating to the Exceptions and Briefs.

7. General Counsel did not file Exceptions within the time frame set forth in the ALJ's Order Transferring Case to the Board.

8. General Counsel filed a Brief in Partial Support of the ALJ's Decision on November 7, 2016, and stated that the ALJ's "findings and conclusions are amply supported in the record" (p. 1), that the recommended remedy is "fully warranted," and that the Board should adopt the Order. (p. 17). ReadyJet's Exceptions filed on November 9, 2016 assert error by the ALJ.

9. General Counsel cannot now say that the Order is incorrect.

WEHREFORE, ReadyJet demands that the General Counsel's Motion to Correct Certain Omissions from the ALJ's Decision and Recommended Order be DENIED.

Respectfully Submitted,

WHITE AND WILLIAMS, LLP

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Dated: November 15, 2016

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CERTIFICATE OF SERVICE

I, John K. Baker, Esquire do hereby certify that on this 15th day of November, 2016, I served a true and correct copy of the foregoing Response to Counsel for the General Counsel's Motion to Correct Certain Omissions from the ALJ's Decision and Recommended Order , upon the following persons via electronic mail and United States first-class mail, postage prepaid and addressed as follows:

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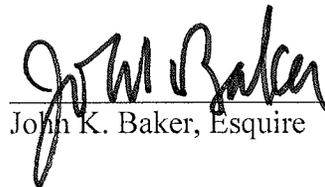
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