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UNITED STATES OF AMERICA
BEFORE THE NATIONAL LABOR RELATIONS BOARD
REGION 28

APEX LINEN SERVICE INC.,

Respondent,

and

INTERNATIONAL UNION OF
OPERATING ENGINEERS LOCAL 501,
AFL-CIO,

and

ADAM ARELLANO, an individual,

Charging Parties.

Case Nos. 28-CA-192349
28-CA-192774
28-CA-193126
28-CA-193231
28-CA-196285
28-CA-196459
28-CA-197069
28-CA-197182
28-CA-197190
28-CA-198033
28-CA-202027
28-CA-202209
28-CA-203269

28-CA-193128

**APEX LINEN SERVICE INC.’S RESPONSE TO COUNSEL FOR THE GENERAL
COUNSEL’S MOTION TO AMEND COMPLAINT**

Apex Linen Service Inc. (“Apex”) responds to the Counsel for the General Counsel’s Motion to Amend Complaint filed on December 7, 2017 (“Motion”), as follows:

Apex does not oppose the amendment, but wishes to clarify it denies the allegations set forth therein. Specifically, Apex responds to each and every allegation as follows:

1. Answering Paragraph 6(f) of the Proposed Amendment, Apex denies each and every allegation contained therein.
2. Answering Paragraph 6(g) of the Proposed Amendment, Apex denies each and every allegation contained therein.
3. Answering Paragraph 7(u) of the Proposed Amendment, Apex denies each and every allegation contained therein.
4. Answering Paragraph 7(v) of the Proposed Amendment, Apex denies each and every allegation contained therein.

1 **CERTIFICATE OF SERVICE**

2 I hereby certify that I am an employee of NAYLOR & BRASTER and that on this 15th day
3 of December 2017, I caused the document **APEX LINEN SERVICE INC.’S RESPONSE TO**
4 **COUNSEL FOR THE GENERAL COUNSEL’S MOTION TO AMEND COMPLAINT** to
5 be served through the NLRB E-Filing system addressed to and a copy was emailed to the National
6 Labor Relations Board and also emailed or mailed via U.S. Mail to the parties below:

7 Cornele Overstreet – cornele.overstreet@nlrb.gov
8 Regional Director, Region 28
9 National Labor Relations Board
10 600 Las Vegas Blvd. South, Suite 400
11 Las Vegas, NV 89101

12 Adam Arellano
13 8137 Chimney Bluffs Street
14 North Las Vegas, NV 89085-4402

15 Adam Stern, Esq. – laboradam@aol.com
16 The Myers Law Group
17 6464 Sunset Boulevard, Suite 1070
18 Hollywood, CA 90028

19 /s/ Amy Reams
20 An Employee of NAYLOR & BRASTER
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