FORM NLRB-32

E. Ex. 3

SUBPOENA

UNITED STATES OF AMERICA
NATIONAL LABOR RELATIONS BOARD

To Custodian of Records, IAMAW Local District Lodge 725, 5402 Bolsa Avenue, Huntington Beach, CA 92649

As requested by RadNet Management, Inc. d/b/a San Fernando Valley Interventional Radiology and Imaging Center

whose address is 16311 Ventura Blvd., Suite 120, Encino, CA 91436
(Street) (City) (State) (ZIP)

YOU ARE HEREBY REQUIRED AND DIRECTED TO APPEAR BEFORE a Hearing Officer of the National Labor Relations Board

at 11500 W. Olympic Blvd., Suite 600

in the City of Los Angeles, CA

on January 29, 2018 at 9:00 am or any adjourned

or rescheduled date to testify in RadNet Management, Inc. d/b/a San Fernando Valley Interventional Radiology and Imaging Center (31-RM-209388) and RadNet Management, Inc. d/b/a San Fernando Valley Advanced Imaging Center (31-RM-209424)
(Case Name and Number)

If you do not intend to comply with the subpoena, within 5 days (excluding intermediate Saturdays, Sundays, and holidays) after the date the subpoena is received, you must petition in writing to revoke the subpoena. Unless filed through the Board's E-Filing system, the petition to revoke must be received on or before the official closing time of the receiving office on the last day for filing. If filed through the Board's E-Filing system, it may be filed up to 11:59 pm in the local time zone of the receiving office on the last day for filing. Prior to a hearing, the petition to revoke should be filed with the Regional Director; during a hearing, it should be filed with the Hearing Officer or Administrative Law Judge conducting the hearing. See Board's Rules and Regulations, 29 C.F.R Section 102.31(b) (unfair labor practice proceedings) and/or 29 C.F.R. Section 102.66(c) (representation proceedings) and 29 C.F.R Section 102.111(a)(1) and 102.111(b)(3) (time computation). Failure to follow these rules may result in the loss of any ability to raise objections to the subpoena in court.

A-1-ZP9NBN

Under the seal of the National Labor Relations Board, and by direction of the Board, this Subpoena is

Issued at Los Angeles, CA

Dated: January 17, 2018

Marvin Kaplan, Chairman

NOTICE TO WITNESS. Witness fees for attendance, subsistence, and mileage under this subpoena are payable by the party at whose request the witness is subpoenaed. A witness appearing at the request of the General Counsel of the National Labor Relations Board shall submit this subpoena with the voucher when claiming reimbursement.

PRIVACY ACT STATEMENT

Solicitation of the information on this form is authorized by the National Labor Relations Act (NLRA), 29 U.S.C. § 151 *et seq*. The principal use of the information is to assist the National Labor Relations Board (NLRB) in processing representation and/or unfair labor practice proceedings and related proceedings or litigation. The routine uses for the information are fully set forth in the Federal Register, 71 Fed. Reg. 74942-43 (Dec. 13, 2006). The NLRB will further explain these uses upon request. Disclosure of this information to the NLRB is mandatory in that failure to supply the information may cause the NLRB to seek enforcement of the subpoena in federal court.

Case 31-RM-209388

A-1-ZP9NBN

RETURN OF SERVICE

I certify that, being a person over 18 years of age, I duly served a copy of this subpoena

(Check method used.)

- ☐ by person
- ☐ by certified mail
- ☐ by registered mail
- ☐ by telegraph
- ☐ by leaving copy at principal office or place of business at

_____

_____

_____

on the named person on

_____

(Month, day, and year)

_____

(Name of person making service)

_____

(Official title, if any)

CERTIFICATION OF SERVICE

I certify that named person was in attendance as a witness at

_____

on

(Month, day or days, and year)

_____

(Name of person certifying)

_____

(Official title)

FORM NLRB-32

SUBPOENA

UNITED STATES OF AMERICA
NATIONAL LABOR RELATIONS BOARD

To Custodian of Records, IAMAW Local District Lodge 725, 5402 Bolsa Avenue, Huntington Beach, CA 92649

As requested by RadNet Management, Inc. d/b/a San Fernando Valley Advanced Imaging Center

whose address is 14860 Roscoe Blvd., Suite 101, Panorama City, CA 91402
(Street) (City) (State) (ZIP)

YOU ARE HEREBY REQUIRED AND DIRECTED TO APPEAR BEFORE a Hearing Officer of the National Labor Relations Board

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in the City of Los Angeles, CA

on January 29, 2018 at 9:00 am or any adjourned

or rescheduled date to testify in RadNet Management, Inc. d/b/a San Fernando Valley Interventional Radiology and Imaging Center (31-RM-209388) and RadNet Management, Inc. d/b/a San Fernando Valley Advanced Imaging Center (31-RM-209424)
(Case Name and Number)

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A-1-ZPAHDB

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Issued at Los Angeles, CA

Dated: January 17, 2018

Marvin Kaplan, Chairman

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Case 31-RM-209388

A-1-ZPAHDB

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on the named person on

_____

(Month, day, and year)

_____

(Name of person making service)

_____

(Official title, if any)

CERTIFICATION OF SERVICE

I certify that named person was in attendance as a witness at

_____

on

(Month, day or days, and year)

_____

(Name of person certifying)

_____

(Official title)

FORM NLRB-32

SUBPOENA

UNITED STATES OF AMERICA
NATIONAL LABOR RELATIONS BOARD

To Ryan Carrillo, IAMAW Local District Lodge 725, 5402 Bolsa Avenue, Huntington Beach, CA 92649

As requested by RadNet Management, Inc. d/b/a San Fernando Valley Advanced Imaging Center

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A-1-ZPAAZL

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Issued at Los Angeles, CA

Dated: January 17, 2018

Marvin Kaplan, Chairman

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Case 31-RM-209388

A-1-ZPAAZL

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on the named person on

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(Month, day, and year)

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(Name of person making service)

_____

(Official title, if any)

CERTIFICATION OF SERVICE

I certify that named person was in attendance as a witness at

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(Name of person certifying)

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FORM NLRB-32

SUBPOENA

UNITED STATES OF AMERICA
NATIONAL LABOR RELATIONS BOARD

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A-1-ZP9ZXT

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Issued at Los Angeles, CA

Dated: January 17, 2018

Marvin Kaplan, Chairman

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Case 31-RM-209388

A-1-ZP9ZXT

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_____

_____

on the named person on

_____

(Month, day, and year)

_____

(Name of person making service)

_____

(Official title, if any)

CERTIFICATION OF SERVICE

I certify that named person was in attendance as a witness at

_____

on

(Month, day or days, and year)

_____

(Name of person certifying)

_____

(Official title)

FORM NLRB-31

SUBPOENA DUCES TECUM

UNITED STATES OF AMERICA
NATIONAL LABOR RELATIONS BOARD

To Custodian of Records, IAMAW Local District Lodge 725, 5402 Bolsa Avenue, Huntington Beach, CA 92649

As requested by RadNet Management, Inc. d/b/a San Fernando Valley Advanced Imaging Center

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(Case Name and Number)

And you are hereby required to bring with you and produce at said time and place the following books, records, correspondence, and documents:

SEE ATTACHMENT

If you do not intend to comply with the subpoena, within 5 days (excluding intermediate Saturdays, Sundays, and holidays) after the date the subpoena is received, you must petition in writing to revoke the subpoena. Unless filed through the Board's E-Filing system, the petition to revoke must be received on or before the official closing time of the receiving office on the last day for filing. If filed through the Board's E-Filing system, it may be filed up to 11:59 pm in the local time zone of the receiving office on the last day for filing. Prior to a hearing, the petition to revoke should be filed with the Regional Director; during a hearing, it should be filed with the Hearing Officer or Administrative Law Judge conducting the hearing. See Board's Rules and Regulations, 29 C.F.R Section 102.31(b) (unfair labor practice proceedings) and/or 29 C.F.R. Section 102.66(c) (representation proceedings) and 29 C.F.R Section 102.111(a)(1) and 102.111(b)(3) (time computation). Failure to follow these rules may result in the loss of any ability to raise objections to the subpoena in court.

B-1-ZPBF05

Under the seal of the National Labor Relations Board, and by direction of the Board, this Subpoena is

Issued at

Dated: January 17, 2018

Marvin Kaplan, Chairman

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Case 31-RM-209388

B-1-ZPBF05

RETURN OF SERVICE

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(Check method used.)

- ☐ by person
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- ☐ by telegraph
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_____

on the named person on

_____

(Month, day, and year)

_____

(Name of person making service)

_____

(Official title, if any)

CERTIFICATION OF SERVICE

I certify that named person was in attendance as a witness at

_____

on

(Month, day or days, and year)

_____

(Name of person certifying)

_____

(Official title)

UNITED STATES OF AMERICA
NATIONAL LABOR RELATIONS BOARD
REGION 31

RADNET MANAGEMENT, INC. D/B/A SAN FERNANDO VALLEY ADVANCED IMAGING CENTER Petitioner *and* NATIONAL UNION OF HEALTHCARE WORKERS Labor Organization	Case No. 31-RM-209424

ATTACHMENT TO SUBPOENA *DUCES TECUM* NO. B-1-ZPBF05

By service of Subpoena *Duces Tecum* No. B-1-ZPBF05, RadNet Management, Inc. d/b/a San Fernando Valley Advanced Imaging Center (hereafter, "RadNet") hereby seeks production of all requested documents within your possession, custody or control without regard to who has physical possession of them or who prepared the documents, and wherever retained.

Documents produced should be grouped and in the order that they are maintained in the normal course, and should include all files and file labels in which the documents, and extra copies of them, are located.

For any document withheld on a claim of privilege and/or under the work-product doctrine or any other claimed immunity from production,

identify the date, author, recipients, title, general nature and privilege and / or immunity claimed.

If additional documents are discovered that fall within the terms of this request, the additional items shall be produced immediately.

DEFINITIONS

1.) "Documents," as used below, includes all material defined in Rule 34 of the Federal Rules of Civil Procedure, and are not limited to the specific examples listed, and further includes any written document of any nature whatsoever (*including but not limited to any emails or text messages*), any audio-tape, any video-tape, or any repository of any electronic data, such as computer hard drives or memory cards of portable communication devices.

2.) "Employee(s)," as used below, refers to the employees working out of any one or more of the facilities referenced by the Petition filed by the National Union of Healthcare Workers in Case No. 31-RC-208646. A copy of the Petition is attached hereto as "Exhibit A."

3.) "NUHW," as used below, refers to the National Union of Healthcare Workers, and / or any affiliated entity, including but not limited to the International Association of Machinists and Aerospaec Workers, together with all current and former officers and employees thereof and any outside persons or entities retained to act on their behalf.

4.) The "Union," as used below, refers to the International Association of Machinists and Aerospace Workers, and / or any affiliated entity, including but not limited to the National Union of Healthcare Workers, together with all current and former officers and employees thereof and any outside persons or entities retained to act on their behalf.

DOCUMENTS TO BE PRODUCED

1.) Any and all documents, including but not limited to any e-mails or text messages, in which any Employee informs the Union that he or she, or some other Employee, is opposed to representation by the NUHW or prefers not to communicate with the Union or the NUHW about representation by the NUHW. RadNet requests that any responsive documents initially be produced only to the hearing officer for *in camera* review.

2.) For the period October 1, 2017 to the present, any and all documents, including but not limited to phone records, that show, refer, evidence or relate to any communication by the Union, the NUHW, or any Employee to the Los Angeles Police Department and / or any communication from the Los Angeles Police Department to the Union, the NUHW, or any Employee.

3.) Any document sufficient to identify by full name, current work address and current home address any and all individuals who engaged in any activity in support of the NUHW's efforts to organize the Employees.

4.) Any and all documents, including but not limited to any e-mails or text messages, sent by the Union to any Employee in which the Union makes any reference to any police report that may be filed or has been filed against any Employee, and / or any manager assigned to any facility operated by RadNet Management, Inc., and / or any facility operated by RadNet Management, Inc. RadNet requests that any responsive documents initially be produced only to the hearing officer for *in camera* review.

5.) Any and all documents, including but not limited to any e-mails or text messages, sent by any Employee to the Union in which the Employee makes any reference to any police report that may be filed or has been filed against any Employee, and / or any manager assigned to any facility operated by RadNet Management, Inc., and / or any facility operated by RadNet Management, Inc. RadNet requests that any responsive documents initially be produced only to the hearing officer for *in camera* review.

6.) Any and all documents, including but not limited to any e-mails or text messages, sent by the Union to the NUHW in which the Union makes any reference to any police report that may be filed or has been filed against any Employee, and / or any manager assigned to any facility operated by RadNet Management, Inc., and / or any facility operated by RadNet Management, Inc.

RadNet requests that any responsive documents initially be produced only to the hearing officer for *in camera* review.

7.) Any and all documents, including but not limited to any e-mails or text messages, sent by the NUHW to the Union in which the NUHW makes any reference to any police report that may be filed or has been filed against any Employee, and / or any manager assigned to any facility operated by RadNet Management, Inc., and / or any facility operated by RadNet Management, Inc. RadNet requests that any responsive documents initially be produced only to the hearing officer for *in camera* review.

EXHIBIT A

FORM NLRB-502 (RC)
(4-15)

UNITED STATES GOVERNMENT
NATIONAL LABOR RELATIONS BOARD

RC PETITION

DO NOT WRITE IN THIS SPACE	
Case No. 31-RC-208646	Date Filed 10/26/2017

INSTRUCTIONS: Unless e-Filed using the Agency's website, www.nlrb.gov, submit an original of this Petition to an NLRB office in the Region in which the employer concerned is located. The petition must be accompanied by both a showing of interest (see 6b below) and a certificate of service showing service on the employer and all other parties named in the petition of: (1) the petition; (2) Statement of Position form (Form NLRB-505); and (3) Description of Representation Case Procedures (Form NLRB 4812). The showing of interest should only be filed with the NLRB and should not be served on the employer or any other party.

1. PURPOSE OF THIS PETITION: RC-CERTIFICATION OF REPRESENTATIVE - A substantial number of employees wish to be represented for purposes of collective bargaining by Petitioner and Petitioner desires to be certified as representative of the employees. **The Petitioner alleges that the following circumstances exist and requests that the National Labor Relations Board proceed under its proper authority pursuant to Section 9 of the National Labor Relations Act.**

2a. Name of Employer	2b. Address(es) of Establishment(s) involved *(Street and number, city, State, ZIP code)*
RadNet Inc. and Radnet Management Inc., Joint Employers	see attachment

3a. Employer Representative – Name and Title	3b. Address (If same as 2b – state same)		
Christopher Catalano	18133 Ventura Blvd, Suite 100, Tarzana, CA 91356		
3c. Tel. No. (818) 933-2020 ext 1261	3d. Cell No. (805) 750-1013	3e. Fax No.	3f. E-Mail Address chris.catalano@radnet.com

4a. Type of Establishment *(Factory, mine, wholesaler, etc.)*	4b. Principal product or service	5a. City and State where unit is located:
Healthcare facility	Outpatient Imaging services	see attachment

5b. Description of Unit Involved
Included: All full-time, and regular part-time, per diem RN and Technical employees, employed by the employer at its facilities in the San Fernando Valley Region listed in 2b.
Excluded: All other employees, managers, confidential employees, guards, physicians, service, office clericals and supervisors as defined by the Act.

5a. No. of Employees in Unit: 115

5b. Do a substantial number (30% or more) of the employees in the unit wish to be represented by the Petitioner? Yes [✓] No [ ]

Check One:
[✓] 7a. Request for recognition as Bargaining Representative was made on (Date) 10/11/2017 and Employer declined recognition on or about 10/11/2017 (Date) *(If no reply received, so state).*
[ ] 7b. Petitioner is currently recognized as Bargaining Representative and desires certification under the Act.

8a. Name of Recognized or Certified Bargaining Agent *(If none, so state).*	8b. Address		
none			
8c. Tel No.	8d Cell No.	8e. Fax No.	8f. E-Mail Address
8g. Affiliation, if any		8h. Date of Recognition or Certification	8i. Expiration Date of Current or Most Recent Contract, if any *(Month, Day, Year)*

9. Is there now a strike or picketing at the Employer's establishment(s) involved? no if so, approximately how many employees are participating? _____
(Name of labor organization) _____, has picketed the Employer since *(Month, Day, Year)* _____.

10. Organizations or individuals other than Petitioner and those named in items 8 and 9, which have claimed recognition as representatives and other organizations and individuals known to have a representative interest in any employees in the unit described in item 5b above. *(If none, so state)*
none

10a. Name	10b. Address	10c. Tel. No.	10d. Cell No.
		10e. Fax No.	10f. E-Mail Address

11. Election Details: If the NLRB conducts an election in this matter, state your position with respect to any such election.	11a. Election Type: [ ] Manual [✓] Mail [ ] Mixed Manual/Mail
11b. Election Date(s): ~~11/7/17-11/21/17~~ 11/7/17-11/21/17 — 11c. Election Time(s):	11d. Election Location(s):

12a. Full Name of Petitioner *(including local name and number)*	12b. Address *(street and number, city, state, and ZIP code)*
National Union of Healthcare Workers	5801 Christie Ave. Suite 525, Emeryville, CA 94608

12c. Full name of national or international labor organization of which Petitioner is an affiliate or constituent *(If none, so state)*
none

12d. Tel No.	12e. Cell No.	12f. Fax No.	12g. E-Mail Address
(510) 834-2017			

13. Representative of the Petitioner who will accept service of all papers for purposes of the representation proceeding.

13a. Name and Title	13b. Address *(street and number, city, state, and ZIP code)*		
Sophia Mendoza, Organizer	225 W. Broadway, Suite 155, Glendale, CA 91204		
13c. Tel No.	13d. Cell No. (213) 280-0051	13e. Fax No. (818) 241-0141	13f. E-Mail Address smendoza@nuhw.org

I declare that I have read the above petition and that the statements are true to the best of my knowledge and belief.

Name *(Print)*	Signature	Title	Date
Florice Hoffman	Florice Hoffman	Attorney	~~10/24/17~~ 10/24/17

WILLFUL FALSE STATEMENTS ON THIS PETITION CAN BE PUNISHED BY FINE AND IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001)

PRIVACY ACT STATEMENT

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Radnet SFV RC petition Attachments:

Center	Address	City
Burbank Imaging X-Ray	3808 Riverside Dr., Ste. 120	Burbank, CA 91505
Burbank Breast Care Center	2601 W. Alameda Ave., Ste. 101	Burbank, CA 91505
Imaging Specialists of Burbank	1821 W. Olive Ave.	Burbank, CA 91506
Liberty Pacific Advanced Imaging Encino	16130 Ventura Blvd.	Encino, CA 91436
San Fernando Valley Interventional Radiology and Imaging Center	16311 Ventura Boulevard, Ste. 120	Encino, CA 91436
Imaging Specialists of Glendale	700 N. Central Avenue, Suite 100	Glendale, CA 91203
Marcia Ray Breastlink Women's Imaging Center	222 W. Eulalia Street	Glendale, CA 91204
San Fernando Valley Advanced Imaging Center	14860 Roscoe Blvd., Ste. 101	Panorama City, CA 91402
Imaging Specialists of Pasadena	630 S. Raymond Ave. Suite 210	Pasadena, CA 91105
Northridge Diagnostic Center – Walk-In X-Ray	8327 Reseda Blvd.	Reseda, CA 91325
Northridge Diagnostic Center	8227 Reseda Blvd.	Reseda, CA 91335
Liberty Pacific Advanced Imaging Tarzana and Breastlink Women's Imaging	18133 Ventura Blvd., Suite 100 and 200	Tarzana, CA 91356
Burbank Advanced Imaging Center	10101 Riverside Dr.	Toluca Lake, CA 91062
Santa Clarita Imaging	25775 W. McBean Pkwy, Ste. 100 and 216	Valencia, CA 91355
Vanowen Advanced Imaging	15243 Vanowen Street, Ste. 106	Van Nuys, CA 91405
Valley Hills Imaging	23101 Sherman Place, Suite 210	West Hills, CA 91307

5a.
Burbank, CA
Encino, CA
Glendale, CA
Panorama City, CA
Pasadena, CA
Reseda, CA
Tarzana, CA
Toluca Lake, CA
Valencia, CA
Van Nuys, CA
West Hills, CA

FORM NLRB-31

SUBPOENA DUCES TECUM

UNITED STATES OF AMERICA
NATIONAL LABOR RELATIONS BOARD

To Ryan Carrillo, IAMAW Local District Lodge 725, 5402 Bolsa Avenue, Huntington Beach, CA 92649

As requested by RadNet Management, Inc. d/b/a San Fernando Valley Advanced Imaging Center

whose address is 14860 Roscoe Blvd., Suite 101, Panorama City, CA 91402
(Street) (City) (State) (ZIP)

YOU ARE HEREBY REQUIRED AND DIRECTED TO APPEAR BEFORE a Hearing Officer

of the National Labor Relations Board

at 11500 W. Olympic Blvd., Suite 600

in the City of Los Angeles

on January 29, 2018 at 9:00 am or any adjourned

or rescheduled date to testify in RadNet Management, Inc. d/b/a San Fernando Valley Interventional Radiology and Imaging Center (31-RM-209388) and RadNet Management, Inc. d/b/a San Fernando Valley Advanced Imaging Center (31-RM-209424)
(Case Name and Number)

And you are hereby required to bring with you and produce at said time and place the following books, records, correspondence, and documents:

SEE ATTACHMENT

If you do not intend to comply with the subpoena, within 5 days (excluding intermediate Saturdays, Sundays, and holidays) after the date the subpoena is received, you must petition in writing to revoke the subpoena. Unless filed through the Board's E-Filing system, the petition to revoke must be received on or before the official closing time of the receiving office on the last day for filing. If filed through the Board's E-Filing system, it may be filed up to 11:59 pm in the local time zone of the receiving office on the last day for filing. Prior to a hearing, the petition to revoke should be filed with the Regional Director; during a hearing, it should be filed with the Hearing Officer or Administrative Law Judge conducting the hearing. See Board's Rules and Regulations, 29 C.F.R Section 102.31(b) (unfair labor practice proceedings) and/or 29 C.F.R. Section 102.66(c) (representation proceedings) and 29 C.F.R Section 102.111(a)(1) and 102.111(b)(3) (time computation). Failure to follow these rules may result in the loss of any ability to raise objections to the subpoena in court.

B-1-ZPBFVT

Under the seal of the National Labor Relations Board, and by direction of the Board, this Subpoena is

Issued at Los Angeles, CA

Dated: January 17, 2018

Marvin Kaplan, Chairman

NOTICE TO WITNESS. Witness fees for attendance, subsistence, and mileage under this subpoena are payable by the party at whose request the witness is subpoenaed. A witness appearing at the request of the General Counsel of the National Labor Relations Board shall submit this subpoena with the voucher when claiming reimbursement.

PRIVACY ACT STATEMENT

Solicitation of the information on this form is authorized by the National Labor Relations Act (NLRA), 29 U.S.C. § 151 *et seq*. The principal use of the information is to assist the National Labor Relations Board (NLRB) in processing representation and/or unfair labor practice proceedings and related proceedings or litigation. The routine uses for the information are fully set forth in the Federal Register, 71 Fed. Reg. 74942-43 (Dec. 13, 2006). The NLRB will further explain these uses upon request. Disclosure of this information to the NLRB is mandatory in that failure to supply the information may cause the NLRB to seek enforcement of the subpoena in federal court.

Case 31-RM-209388

B-1-ZPBFVT

RETURN OF SERVICE

I certify that, being a person over 18 years of age, I duly served a copy of this subpoena

(Check method used.)

- ☐ by person
- ☐ by certified mail
- ☐ by registered mail
- ☐ by telegraph
- ☐ by leaving copy at principal office or place of business at

_____

_____

_____

on the named person on

_____

(Month, day, and year)

_____

(Name of person making service)

_____

(Official title, if any)

CERTIFICATION OF SERVICE

I certify that named person was in attendance as a witness at

_____

on

(Month, day or days, and year)

_____

(Name of person certifying)

_____

(Official title)

UNITED STATES OF AMERICA
NATIONAL LABOR RELATIONS BOARD
REGION 31

RADNET MANAGEMENT, INC. D/B/A SAN FERNANDO VALLEY ADVANCED IMAGING CENTER Petitioner *and* NATIONAL UNION OF HEALTHCARE WORKERS Labor Organization	Case No. 31-RM-209424

ATTACHMENT TO SUBPOENA *DUCES TECUM* NO. B-1-ZPBFVT

By service of Subpoena *Duces Tecum* No. B-1-ZPBFVT, RadNet Management, Inc. d/b/a San Fernando Valley Advanced Imaging Center (hereafter, "RadNet") hereby seeks production of all requested documents within your possession, custody or control without regard to who has physical possession of them or who prepared the documents, and wherever retained.

Documents produced should be grouped and in the order that they are maintained in the normal course, and should include all files and file labels in which the documents, and extra copies of them, are located.

For any document withheld on a claim of privilege and/or under the work-product doctrine or any other claimed immunity from production,

identify the date, author, recipients, title, general nature and privilege and / or immunity claimed.

If additional documents are discovered that fall within the terms of this request, the additional items shall be produced immediately.

DEFINITIONS

1.) "Documents," as used below, includes all material defined in Rule 34 of the Federal Rules of Civil Procedure, and are not limited to the specific examples listed, and further includes any written document of any nature whatsoever (*including but not limited to any emails or text messages*), any audio-tape, any video-tape, or any repository of any electronic data, such as computer hard drives or memory cards of portable communication devices.

2.) "Employee(s)," as used below, refers to the employees working out of any one or more of the facilities referenced by the Petition filed by the National Union of Healthcare Workers in Case No. 31-RC-208646. A copy of the Petition is attached hereto as "Exhibit A."

3.) "NUHW," as used below, refers to the National Union of Healthcare Workers, and / or any affiliated entity, including but not limited to the International Association of Machinists and Aerospaec Workers, together with all current and former officers and employees thereof and any outside persons or entities retained to act on their behalf.

4.) The "Union," as used below, refers to the International Association of Machinists and Aerospace Workers, and / or any affiliated entity, including but not limited to the National Union of Healthcare Workers, together with all current and former officers and employees thereof and any outside persons or entities retained to act on their behalf.

5.) "You," as used below, refers to Mr. Ryan Carrillo.

DOCUMENTS TO BE PRODUCED

1.) Any and all documents, including but not limited to any e-mails or text messages, in which any Employee informs You that he or she, or some other Employee, is opposed to representation by the NUHW or prefers not to communicate with the Union or the NUHW about representation by the NUHW. RadNet requests that any responsive documents initially be produced only to the hearing officer for *in camera* review.

2.) For the period October 1, 2017 to the present, any and all documents, including but not limited to phone records, that show, refer, evidence or relate to any communication by You, the Union, the NUHW, or any Employee to the Los Angeles Police Department and / or any communication from the Los Angeles Police Department to You, the Union, the NUHW, or any Employee.

3.) Any document sufficient to identify by full name, current work address and current home address any and all individuals who engaged in any activity in support of the NUHW's efforts to organize the Employees.

4.) Any and all documents, including but not limited to any e-mails or text messages, sent by You to any Employee in which the You make any reference to any police report that may be filed or has been filed against any Employee, and / or any manager assigned to any facility operated by RadNet Management, Inc., and / or any facility operated by RadNet Management, Inc. RadNet requests that any responsive documents initially be produced only to the hearing officer for *in camera* review.

5.) Any and all documents, including but not limited to any e-mails or text messages, sent by any Employee to You in which the Employee makes any reference to any police report that may be filed or has been filed against any Employee, and / or any manager assigned to any facility operated by RadNet Management, Inc., and / or any facility operated by RadNet Management, Inc. RadNet requests that any responsive documents initially be produced only to the hearing officer for *in camera* review.

6.) Any and all documents, including but not limited to any e-mails or text messages, sent by You to the NUHW, including but not limited to Ms. Sophia Mendoza, in which You make any reference to any police report that may be

filed or has been filed against any Employee, and / or any manager assigned to any facility operated by RadNet Management, Inc., and / or any facility operated by RadNet Management, Inc. RadNet requests that any responsive documents initially be produced only to the hearing officer for *in camera* review.

7.) Any and all documents, including but not limited to any e-mails or text messages, sent by the NUHW, including but not limited to Ms. Sophia Mendoza, to the You in which the NUHW makes any reference to any police report that may be filed or has been filed against any Employee, and / or any manager assigned to any facility operated by RadNet Management, Inc., and / or any facility operated by RadNet Management, Inc. RadNet requests that any responsive documents initially be produced only to the hearing officer for *in camera* review.

EXHIBIT A

FORM NLRB-502 (RC)
(4-15)

UNITED STATES GOVERNMENT
NATIONAL LABOR RELATIONS BOARD

RC PETITION

DO NOT WRITE IN THIS SPACE

Case No.	Date Filed
31-RC-208646	10/26/2017

***INSTRUCTIONS:** Unless e-Filed using the Agency's website, www.nlrb.gov, submit an original of this Petition to an NLRB office in the Region in which the employer concerned is located. The petition must be accompanied by both a showing of interest (see 6b below) and a certificate of service showing service on the employer and all other parties named in the petition of: (1) the petition; (2) Statement of Position form (Form NLRB-505); and (3) Description of Representation Case Procedures (Form NLRB 4812). The showing of interest should only be filed with the NLRB and should not be served on the employer or any other party.*

1. PURPOSE OF THIS PETITION: RC-CERTIFICATION OF REPRESENTATIVE - A substantial number of employees wish to be represented for purposes of collective bargaining by Petitioner and Petitioner desires to be certified as representative of the employees. The Petitioner alleges that the following circumstances exist and requests that the National Labor Relations Board proceed under its proper authority pursuant to Section 9 of the National Labor Relations Act.

2a. Name of Employer	2b. Address(es) of Establishment(s) involved (Street and number, city, State, ZIP code)
RadNet Inc. and Radnet Management Inc., Joint Employers	see attachment

3a. Employer Representative – Name and Title	3b. Address (If same as 2b – state same)
Christopher Catalano	18133 Ventura Blvd, Suite 100, Tarzana, CA 91356

3c. Tel. No.	3d. Cell No.	3e. Fax No.	3f. E-Mail Address
(818) 933-2020 ext 1261	(805) 750-1013		chris.catalano@radnet.com

4a. Type of Establishment (Factory, mine, wholesaler, etc.)	4b. Principal product or service	5a. City and State where unit is located
Healthcare facility	Outpatient Imaging services	see attachment

5b. Description of Unit Involved

Included: All full-time, and regular part-time, per diem RN and Technical employees, employed by the employer at its facilities in the San Fernando Valley Region listed in 2b.

Excluded: All other employees, managers, confidential employees, guards, physicians, service, office clericals and supervisors as defined by the Act.

5a. No. of Employees in Unit: 115

5b. Do a substantial number (30% or more) of the employees in the unit wish to be represented by the Petitioner? Yes [✓] No [ ]

Check One: [✓] 7a. Request for recognition as Bargaining Representative was made on (Date) 10/11/2017 and Employer declined recognition on or about 10/11/2017 (Date) (If no reply received, so state).

[ ] 7b. Petitioner is currently recognized as Bargaining Representative and desires certification under the Act.

8a. Name of Recognized or Certified Bargaining Agent (If none, so state).	8b. Address
none	

8c. Tel No.	8d Cell No.	8e. Fax No.	8f. E-Mail Address

8g. Affiliation, if any	8h. Date of Recognition or Certification	8i. Expiration Date of Current or Most Recent Contract, if any (Month, Day, Year)

9. Is there now a strike or picketing at the Employer's establishment(s) involved? no If so, approximately how many employees are participating? _____

(Name of labor organization) _____, has picketed the Employer since (Month, Day, Year) _____.

10. Organizations or individuals other than Petitioner and those named in items 8 and 9, which have claimed recognition as representatives and other organizations and individuals known to have a representative interest in any employees in the unit described in item 5b above. (If none, so state)

none

10a. Name	10b. Address	10c. Tel. No.	10d. Cell No.
		10e. Fax No.	10f. E-Mail Address

11. Election Details: If the NLRB conducts an election in this matter, state your position with respect to any such election.

11a. Election Type: [ ] Manual [✓] Mail [ ] Mixed Manual/Mail

11b. Election Date(s):	11c. Election Time(s):	11d. Election Location(s):
11/7/17-11/21/17		

12a. Full Name of Petitioner (including local name and number)	12b. Address (street and number, city, state, and ZIP code)
National Union of Healthcare Workers	5801 Christie Ave. Suite 525, Emeryville, CA 94608

12c. Full name of national or international labor organization of which Petitioner is an affiliate or constituent (if none, so state)

none

12d. Tel No.	12e. Cell No.	12f. Fax No.	12g. E-Mail Address
(510) 834-2017			

13. Representative of the Petitioner who will accept service of all papers for purposes of the representation proceeding.

13a. Name and Title	13b. Address (street and number, city, state, and ZIP code)
Sophia Mendoza, Organizer	225 W. Broadway, Suite 155, Glendale, CA 91204

13c. Tel No.	13d. Cell No.	13e. Fax No.	13f. E-Mail Address
	(213) 280-0051	(818) 241-0141	smendoza@nuhw.org

I declare that I have read the above petition and that the statements are true to the best of my knowledge and belief.

Name (Print)	Signature	Title	Date
Florice Hoffman		Attorney	10/24/17

WILLFUL FALSE STATEMENTS ON THIS PETITION CAN BE PUNISHED BY FINE AND IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001)

PRIVACY ACT STATEMENT

Solicitation of the information on this form is authorized by the National Labor Relations Act (NLRA), 29 U.S.C. § 151 *et seq.* The principal use of the information is to assist the National Labor Relations Board (NLRB) in processing representation and related proceedings or litigation. The routine uses for the information are fully set forth in the Federal Register, 71 Fed. Reg. 74942-43 (Dec. 13, 2006). The NLRB will further explain these uses upon request. Disclosure of this information to the NLRB is voluntary; however, failure to supply the information will cause the NLRB to decline to invoke its processes.

5a.
Burbank, CA
Encino, CA
Glendale, CA
Panorama City, CA
Pasadena, CA
Reseda, CA
Tarzana, CA
Toluca Lake, CA
Valencia, CA
Van Nuys, CA
West Hills, CA

FORM NLRB-31

SUBPOENA DUCES TECUM

UNITED STATES OF AMERICA
NATIONAL LABOR RELATIONS BOARD

To Ryan Carrillo, IAMAW Local District Lodge 725, 5402 Bolsa Avenue, Huntington Beach, CA 92649

As requested by RadNet Management, Inc. d/b/a San Fernando Valley Interventional Radiology and Imaging Center

whose address is 16311 Ventura Blvd., Suite 120, Encino, CA 91436
(Street) (City) (State) (ZIP)

YOU ARE HEREBY REQUIRED AND DIRECTED TO APPEAR BEFORE a Hearing Officer

of the National Labor Relations Board

at 11500 W. Olympic Blvd., Suite 600

in the City of Los Angeles

on January 29, 2018 at 9:00 am or any adjourned

or rescheduled date to testify in RadNet Management, Inc. d/b/a San Fernando Valley Interventional Radiology and Imaging Center (31-RM-209388) and RadNet Management, Inc. d/b/a San Fernando Valley Advanced Imaging Center (31-RM-209424)
(Case Name and Number)

And you are hereby required to bring with you and produce at said time and place the following books, records, correspondence, and documents:

SEE ATTACHMENT

If you do not intend to comply with the subpoena, within 5 days (excluding intermediate Saturdays, Sundays, and holidays) after the date the subpoena is received, you must petition in writing to revoke the subpoena. Unless filed through the Board's E-Filing system, the petition to revoke must be received on or before the official closing time of the receiving office on the last day for filing. If filed through the Board's E-Filing system, it may be filed up to 11:59 pm in the local time zone of the receiving office on the last day for filing. Prior to a hearing, the petition to revoke should be filed with the Regional Director; during a hearing, it should be filed with the Hearing Officer or Administrative Law Judge conducting the hearing. See Board's Rules and Regulations, 29 C.F.R Section 102.31(b) (unfair labor practice proceedings) and/or 29 C.F.R. Section 102.66(c) (representation proceedings) and 29 C.F.R Section 102.111(a)(1) and 102.111(b)(3) (time computation). Failure to follow these rules may result in the loss of any ability to raise objections to the subpoena in court.

B-1-ZPBAKZ

Under the seal of the National Labor Relations Board, and by direction of the Board, this Subpoena is

Issued at Los Angeles, CA

Dated: January 17, 2018

Marvin Kaplan, Chairman

NOTICE TO WITNESS. Witness fees for attendance, subsistence, and mileage under this subpoena are payable by the party at whose request the witness is subpoenaed. A witness appearing at the request of the General Counsel of the National Labor Relations Board shall submit this subpoena with the voucher when claiming reimbursement.

PRIVACY ACT STATEMENT

Solicitation of the information on this form is authorized by the National Labor Relations Act (NLRA), 29 U.S.C. § 151 *et seq.* The principal use of the information is to assist the National Labor Relations Board (NLRB) in processing representation and/or unfair labor practice proceedings and related proceedings or litigation. The routine uses for the information are fully set forth in the Federal Register, 71 Fed. Reg. 74942-43 (Dec. 13, 2006). The NLRB will further explain these uses upon request. Disclosure of this information to the NLRB is mandatory in that failure to supply the information may cause the NLRB to seek enforcement of the subpoena in federal court.

Case 31-RM-209388

B-1-ZPBAKZ

RETURN OF SERVICE

I certify that, being a person over 18 years of age, I duly served a copy of this subpoena

(Check method used.)

- ☐ by person
- ☐ by certified mail
- ☐ by registered mail
- ☐ by telegraph
- ☐ by leaving copy at principal office or place of business at

_____

_____

_____

on the named person on

_____

(Month, day, and year)

_____

(Name of person making service)

_____

(Official title, if any)

CERTIFICATION OF SERVICE

I certify that named person was in attendance as a witness at

_____

on

(Month, day or days, and year)

_____

(Name of person certifying)

_____

(Official title)

UNITED STATES OF AMERICA
NATIONAL LABOR RELATIONS BOARD
REGION 31

RADNET MANAGEMENT, INC. D/B/A SAN FERNANDO VALLEY INTERVENTIONAL RADIOLOGY AND IMAGING CENTER Petitioner *and* NATIONAL UNION OF HEALTHCARE WORKERS Labor Organization	Case No. 31-RM-209388

ATTACHMENT TO SUBPOENA *DUCES TECUM* NO. B-1-ZPBAKZ

By service of Subpoena *Duces Tecum* No. B-1-ZPBAKZ, RadNet Management, Inc. d/b/a San Fernando Valley Interventional Radiology and Imaging Center (hereafter, "RadNet") hereby seeks production of all requested documents within your possession, custody or control without regard to who has physical possession of them or who prepared the documents, and wherever retained.

Documents produced should be grouped and in the order that they are maintained in the normal course, and should include all files and file labels in which the documents, and extra copies of them, are located.

For any document withheld on a claim of privilege and/or under the work-product doctrine or any other claimed immunity from production, identify the date, author, recipients, title, general nature and privilege and / or immunity claimed.

If additional documents are discovered that fall within the terms of this request, the additional items shall be produced immediately.

DEFINITIONS

1.) "Documents," as used below, includes all material defined in Rule 34 of the Federal Rules of Civil Procedure, and are not limited to the specific examples listed, and further includes any written document of any nature whatsoever (*including but not limited to any emails or text messages*), any audio-tape, any video-tape, or any repository of any electronic data, such as computer hard drives or memory cards of portable communication devices.

2.) "Employee(s)," as used below, refers to the employees working out of any one or more of the facilities referenced by the Petition filed by the National Union of Healthcare Workers in Case No. 31-RC-208646. A copy of the Petition is attached hereto as "Exhibit A."

3.) "NUHW," as used below, refers to the National Union of Healthcare Workers, and / or any affiliated entity, including but not limited to the International Association of Machinists and Aerospaec Workers, together

with all current and former officers and employees thereof and any outside persons or entities retained to act on their behalf.

4.) The "Union," as used below, refers to the International Association of Machinists and Aerospace Workers, and / or any affiliated entity, including but not limited to the National Union of Healthcare Workers, together with all current and former officers and employees thereof and any outside persons or entities retained to act on their behalf.

5.) "You," as used below, refers to Mr. Ryan Carrillo.

DOCUMENTS TO BE PRODUCED

1.) Any and all documents, including but not limited to any e-mails or text messages, in which any Employee informs You that he or she, or some other Employee, is opposed to representation by the NUHW or prefers not to communicate with the Union or the NUHW about representation by the NUHW. RadNet requests that any responsive documents initially be produced only to the hearing officer for *in camera* review.

2.) For the period October 1, 2017 to the present, any and all documents, including but not limited to phone records, that show, refer, evidence or relate to any communication by You, the Union, the NUHW, or any Employee to the Los Angeles Police Department and / or any communication from the Los Angeles Police Department to You, the Union, the NUHW, or any Employee.

3.) Any document sufficient to identify by full name, current work address and current home address any and all individuals who engaged in any activity in support of the NUHW's efforts to organize the Employees.

4.) Any and all documents, including but not limited to any e-mails or text messages, sent by You to any Employee in which the You make any reference to any police report that may be filed or has been filed against any Employee, and / or any manager assigned to any facility operated by RadNet Management, Inc., and / or any facility operated by RadNet Management, Inc. RadNet requests that any responsive documents initially be produced only to the hearing officer for *in camera* review.

5.) Any and all documents, including but not limited to any e-mails or text messages, sent by any Employee to You in which the Employee makes any reference to any police report that may be filed or has been filed against any Employee, and / or any manager assigned to any facility operated by RadNet Management, Inc., and / or any facility operated by RadNet Management, Inc. RadNet requests that any responsive documents initially be produced only to the hearing officer for *in camera* review.

6.) Any and all documents, including but not limited to any e-mails or text messages, sent by You to the NUHW, including but not limited to Ms. Sophia Mendoza, in which You make any reference to any police report that may be

filed or has been filed against any Employee, and / or any manager assigned to any facility operated by RadNet Management, Inc., and / or any facility operated by RadNet Management, Inc. RadNet requests that any responsive documents initially be produced only to the hearing officer for *in camera* review.

7.) Any and all documents, including but not limited to any e-mails or text messages, sent by the NUHW, including but not limited to Ms. Sophia Mendoza, to the You in which the NUHW makes any reference to any police report that may be filed or has been filed against any Employee, and / or any manager assigned to any facility operated by RadNet Management, Inc., and / or any facility operated by RadNet Management, Inc. RadNet requests that any responsive documents initially be produced only to the hearing officer for *in camera* review.

EXHIBIT A

FORM NLRB-502 (RC)
(4-15)

UNITED STATES GOVERNMENT
NATIONAL LABOR RELATIONS BOARD

RC PETITION

DO NOT WRITE IN THIS SPACE

Case No.	Date Filed
31-RC-208646	10/26/2017

***INSTRUCTIONS:** Unless e-Filed using the Agency's website, www.nlrb.gov, submit an original of this Petition to an NLRB office in the Region in which the employer concerned is located. The petition must be accompanied by both a showing of interest (see 6b below) and a certificate of service showing service on the employer and all other parties named in the petition of: (1) the petition; (2) Statement of Position form (Form NLRB-505); and (3) Description of Representation Case Procedures (Form NLRB 4812). The showing of interest should only be filed with the NLRB and should not be served on the employer or any other party.*

1. PURPOSE OF THIS PETITION: RC-CERTIFICATION OF REPRESENTATIVE - A substantial number of employees wish to be represented for purposes of collective bargaining by Petitioner and Petitioner desires to be certified as representative of the employees. **The Petitioner alleges that the following circumstances exist and requests that the National Labor Relations Board proceed under its proper authority pursuant to Section 9 of the National Labor Relations Act.**

2a. Name of Employer	2b. Address(es) of Establishment(s) involved *(Street and number, city, State, ZIP code)*
RadNet Inc. and Radnet Management Inc., Joint Employers	see attachment

3a. Employer Representative – Name and Title	3b. Address (if same as 2b – state same)
Christopher Catalano	18133 Ventura Blvd, Suite 100, Tarzana, CA 91356

3c. Tel. No.	3d. Cell No.	3e. Fax No.	3f. E-Mail Address
(818) 933-2020 ext 1261	(805) 750-1013		chris.catalano@radnet.com

4a. Type of Establishment *(Factory, mine, wholesaler, etc.)*	4b. Principal product or service	5a. City and State where unit is located:
Healthcare facility	Outpatient Imaging services	see attachment

5b. Description of Unit Involved

Included: All full-time, and regular part-time, per diem RN and Technical employees, employed by the employer at its facilities in the San Fernando Valley Region listed in 2b.

Excluded: All other employees, managers, confidential employees, guards, physicians, service, office clericals and supervisors as defined by the Act.

5a. No. of Employees in Unit: 115

5b. Do a substantial number (30% or more) of the employees in the unit wish to be represented by the Petitioner? Yes [✓] No [ ]

Check One:
[✓] 7a. Request for recognition as Bargaining Representative was made on (Date) 10/11/2017 and Employer declined recognition on or about 10/11/2017 (Date) *(If no reply received, so state).*
[ ] 7b. Petitioner is currently recognized as Bargaining Representative and desires certification under the Act.

8a. Name of Recognized or Certified Bargaining Agent *(If none, so state).*	8b. Address
none	

8c. Tel No.	8d Cell No.	8e. Fax No.	8f. E-Mail Address

8g. Affiliation, if any	8h. Date of Recognition or Certification	8i. Expiration Date of Current or Most Recent Contract, if any *(Month, Day, Year)*

9. Is there now a strike or picketing at the Employer's establishment(s) involved? no if so, approximately how many employees are participating? _____

(Name of labor organization) _____, has picketed the Employer since *(Month, Day, Year)* _____.

10. Organizations or individuals other than Petitioner and those named in items 8 and 9, which have claimed recognition as representatives and other organizations and individuals known to have a representative interest in any employees in the unit described in item 5b above. *(If none, so state)*
none

10a. Name	10b. Address	10c. Tel. No.	10d. Cell No.
		10e. Fax No.	10f. E-Mail Address

11. **Election Details:** If the NLRB conducts an election in this matter, state your position with respect to any such election.	11a. Election Type: [ ] Manual [✓] Mail [ ] Mixed Manual/Mail
11b. Election Date(s): ~~11/7/17-11/21/17~~ 11/7/17-11/21/17 — 11c. Election Time(s):	11d. Election Location(s):

12a. Full Name of Petitioner *(including local name and number)*	12b. Address *(street and number, city, state, and ZIP code)*
National Union of Healthcare Workers	5801 Christie Ave. Suite 525, Emeryville, CA 94608

12c. Full name of national or international labor organization of which Petitioner is an affiliate or constituent *(If none, so state)*
none

12d. Tel No.	12e. Cell No.	12f. Fax No.	12g. E-Mail Address
(510) 834-2017			

13. Representative of the Petitioner who will accept service of all papers for purposes of the representation proceeding.

13a. Name and Title	13b. Address *(street and number, city, state, and ZIP code)*
Sophia Mendoza, Organizer	225 W. Broadway, Suite 155, Glendale, CA 91204

13c. Tel No.	13d. Cell No.	13e. Fax No.	13f. E-Mail Address
	(213) 280-0051	(818) 241-0141	smendoza@nuhw.org

I declare that I have read the above petition and that the statements are true to the best of my knowledge and belief.

Name *(Print)*	Signature	Title	Date
Fleice Hoffman	Fleice Hoffman	Attorney	10/24/17

WILLFUL FALSE STATEMENTS ON THIS PETITION CAN BE PUNISHED BY FINE AND IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001)

PRIVACY ACT STATEMENT

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Radnet SFV RC petition Attachments:

Center	Address	City
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Burbank Breast Care Center	2601 W. Alameda Ave., Ste. 101	Burbank, CA 91505
Imaging Specialists of Burbank	1821 W. Olive Ave.	Burbank, CA 91506
Liberty Pacific Advanced Imaging Encino	16130 Ventura Blvd.	Encino, CA 91436
San Fernando Valley Interventional Radiology and Imaging Center	16311 Ventura Boulevard, Ste. 120	Encino, CA 91436
Imaging Specialists of Glendale	700 N. Central Avenue, Suite 100	Glendale, CA 91203
Marcia Ray Breastlink Women's Imaging Center	222 W. Eulalia Street	Glendale, CA 91204
San Fernando Valley Advanced Imaging Center	14860 Roscoe Blvd., Ste. 101	Panorama City, CA 91402
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Northridge Diagnostic Center – Walk-In X-Ray	8327 Reseda Blvd.	Reseda, CA 91325
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Liberty Pacific Advanced Imaging Tarzana and Breastlink Women's Imaging	18133 Ventura Blvd., Suite 100 and 200	Tarzana, CA 91356
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Vanowen Advanced Imaging	15243 Vanowen Street, Ste. 106	Van Nuys, CA 91405
Valley Hills Imaging	23101 Sherman Place, Suite 210	West Hills, CA 91307

FORM NLRB-31

SUBPOENA DUCES TECUM

UNITED STATES OF AMERICA
NATIONAL LABOR RELATIONS BOARD

To Custodian of Records, IAMAW Local District Lodge 725, 5402 Bolsa Avenue, Huntington Beach, CA 92649

As requested by RadNet Management, Inc. d/b/a San Fernando Valley Interventional Radiology and Imaging Center

whose address is 16311 Ventura Blvd., Suite 120, Encino, CA 91436
(Street) (City) (State) (ZIP)

YOU ARE HEREBY REQUIRED AND DIRECTED TO APPEAR BEFORE a Hearing Officer

of the National Labor Relations Board

at 11500 W. Olympic Blvd., Suite 600

in the City of Los Angeles

on January 29, 2018 at 9:00 am or any adjourned

or rescheduled date to testify in RadNet Management, Inc. d/b/a San Fernando Valley Interventional Radiology and Imaging Center (31-RM-209388) and RadNet Management, Inc. d/b/a San Fernando Valley Advanced Imaging Center (31-RM-209424)
(Case Name and Number)

And you are hereby required to bring with you and produce at said time and place the following books, records, correspondence, and documents:

SEE ATTACHMENT

If you do not intend to comply with the subpoena, within 5 days (excluding intermediate Saturdays, Sundays, and holidays) after the date the subpoena is received, you must petition in writing to revoke the subpoena. Unless filed through the Board's E-Filing system, the petition to revoke must be received on or before the official closing time of the receiving office on the last day for filing. If filed through the Board's E-Filing system, it may be filed up to 11:59 pm in the local time zone of the receiving office on the last day for filing. Prior to a hearing, the petition to revoke should be filed with the Regional Director; during a hearing, it should be filed with the Hearing Officer or Administrative Law Judge conducting the hearing. See Board's Rules and Regulations, 29 C.F.R Section 102.31(b) (unfair labor practice proceedings) and/or 29 C.F.R. Section 102.66(c) (representation proceedings) and 29 C.F.R Section 102.111(a)(1) and 102.111(b)(3) (time computation). Failure to follow these rules may result in the loss of any ability to raise objections to the subpoena in court.

B-1-ZPBBC7

Under the seal of the National Labor Relations Board, and by direction of the Board, this Subpoena is

Issued at Los Angeles, CA

Dated: January 17, 2018

Marvin Kaplan, Chairman

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Case 31-RM-209388

B-1-ZPBBC7

RETURN OF SERVICE

I certify that, being a person over 18 years of age, I duly served a copy of this subpoena

(Check method used.)

- ☐ by person
- ☐ by certified mail
- ☐ by registered mail
- ☐ by telegraph
- ☐ by leaving copy at principal office or place of business at

_____

_____

_____

on the named person on

_____

(Month, day, and year)

_____

(Name of person making service)

_____

(Official title, if any)

CERTIFICATION OF SERVICE

I certify that named person was in attendance as a witness at

_____

on

(Month, day or days, and year)

_____

(Name of person certifying)

_____

(Official title)

UNITED STATES OF AMERICA
NATIONAL LABOR RELATIONS BOARD
REGION 31

RADNET MANAGEMENT, INC. D/B/A SAN FERNANDO VALLEY INTERVENTIONAL RADIOLOGY AND IMAGING CENTER Petitioner *and* NATIONAL UNION OF HEALTHCARE WORKERS Labor Organization	Case No. 31-RM-209388

ATTACHMENT TO SUBPOENA *DUCES TECUM* NO. B-1-ZPBBC7

By service of Subpoena *Duces Tecum* No. B-1-ZPBBC7, RadNet Management, Inc. d/b/a San Fernando Valley Interventional Radiology and Imaging Center (hereafter, "RadNet") hereby seeks production of all requested documents within your possession, custody or control without regard to who has physical possession of them or who prepared the documents, and wherever retained.

Documents produced should be grouped and in the order that they are maintained in the normal course, and should include all files and file labels in which the documents, and extra copies of them, are located.

For any document withheld on a claim of privilege and/or under the work-product doctrine or any other claimed immunity from production, identify the date, author, recipients, title, general nature and privilege and / or immunity claimed.

If additional documents are discovered that fall within the terms of this request, the additional items shall be produced immediately.

DEFINITIONS

1.) "Documents," as used below, includes all material defined in Rule 34 of the Federal Rules of Civil Procedure, and are not limited to the specific examples listed, and further includes any written document of any nature whatsoever (*including but not limited to any emails or text messages*), any audio-tape, any video-tape, or any repository of any electronic data, such as computer hard drives or memory cards of portable communication devices.

2.) "Employee(s)," as used below, refers to the employees working out of any one or more of the facilities referenced by the Petition filed by the National Union of Healthcare Workers in Case No. 31-RC-208646. A copy of the Petition is attached hereto as "Exhibit A."

3.) "NUHW," as used below, refers to the National Union of Healthcare Workers, and / or any affiliated entity, including but not limited to the International Association of Machinists and Aerospaec Workers, together

with all current and former officers and employees thereof and any outside persons or entities retained to act on their behalf.

4.) The "Union," as used below, refers to the International Association of Machinists and Aerospace Workers, and / or any affiliated entity, including but not limited to the National Union of Healthcare Workers, together with all current and former officers and employees thereof and any outside persons or entities retained to act on their behalf.

DOCUMENTS TO BE PRODUCED

1.) Any and all documents, including but not limited to any e-mails or text messages, in which any Employee informs the Union that he or she, or some other Employee, is opposed to representation by the NUHW or prefers not to communicate with the Union or the NUHW about representation by the NUHW. RadNet requests that any responsive documents initially be produced only to the hearing officer for *in camera* review.

2.) For the period October 1, 2017 to the present, any and all documents, including but not limited to phone records, that show, refer, evidence or relate to any communication by the Union, the NUHW, or any Employee to the Los Angeles Police Department and / or any communication from the Los Angeles Police Department to the Union, the NUHW, or any Employee.

3.) Any document sufficient to identify by full name, current work address and current home address any and all individuals who engaged in any activity in support of the NUHW's efforts to organize the Employees.

4.) Any and all documents, including but not limited to any e-mails or text messages, sent by the Union to any Employee in which the Union makes any reference to any police report that may be filed or has been filed against any Employee, and / or any manager assigned to any facility operated by RadNet Management, Inc., and / or any facility operated by RadNet Management, Inc. RadNet requests that any responsive documents initially be produced only to the hearing officer for *in camera* review.

5.) Any and all documents, including but not limited to any e-mails or text messages, sent by any Employee to the Union in which the Employee makes any reference to any police report that may be filed or has been filed against any Employee, and / or any manager assigned to any facility operated by RadNet Management, Inc., and / or any facility operated by RadNet Management, Inc. RadNet requests that any responsive documents initially be produced only to the hearing officer for *in camera* review.

6.) Any and all documents, including but not limited to any e-mails or text messages, sent by the Union to the NUHW in which the Union makes any reference to any police report that may be filed or has been filed against any

Employee, and / or any manager assigned to any facility operated by RadNet Management, Inc., and / or any facility operated by RadNet Management, Inc. RadNet requests that any responsive documents initially be produced only to the hearing officer for *in camera* review.

7.) Any and all documents, including but not limited to any e-mails or text messages, sent by the NUHW to the Union in which the NUHW makes any reference to any police report that may be filed or has been filed against any Employee, and / or any manager assigned to any facility operated by RadNet Management, Inc., and / or any facility operated by RadNet Management, Inc. RadNet requests that any responsive documents initially be produced only to the hearing officer for *in camera* review.

EXHIBIT A

FORM NLRB-502 (RC)
(4-15)

UNITED STATES GOVERNMENT
NATIONAL LABOR RELATIONS BOARD

RC PETITION

DO NOT WRITE IN THIS SPACE

Case No.	Date Filed
31-RC-208646	10/26/2017

***INSTRUCTIONS:** Unless e-Filed using the Agency's website, www.nlrb.gov, submit an original of this Petition to an NLRB office in the Region in which the employer concerned is located. The petition must be accompanied by both a showing of interest (see 6b below) and a certificate of service showing service on the employer and all other parties named in the petition of: (1) the petition; (2) Statement of Position form (Form NLRB-505); and (3) Description of Representation Case Procedures (Form NLRB 4812). The showing of interest should only be filed with the NLRB and should not be served on the employer or any other party.*

1. PURPOSE OF THIS PETITION: RC-CERTIFICATION OF REPRESENTATIVE - A substantial number of employees wish to be represented for purposes of collective bargaining by Petitioner and Petitioner desires to be certified as representative of the employees. The Petitioner alleges that the following circumstances exist and requests that the National Labor Relations Board proceed under its proper authority pursuant to Section 9 of the National Labor Relations Act.

2a. Name of Employer	2b. Address(es) of Establishment(s) involved (Street and number, city, State, ZIP code)
RadNet Inc. and Radnet Management Inc., Joint Employers	see attachment

3a. Employer Representative – Name and Title	3b. Address (If same as 2b – state same)
Christopher Catalano	18133 Ventura Blvd, Suite 100, Tarzana, CA 91356

3c. Tel. No.	3d. Cell No.	3e. Fax No.	3f. E-Mail Address
(818) 933-2020 ext 1261	(805) 750-1013		chris.catalano@radnet.com

4a. Type of Establishment (Factory, mine, wholesaler, etc.)	4b. Principal product or service	5a. City and State where unit is located
Healthcare facility	Outpatient Imaging services	see attachment

5b. Description of Unit Involved

Included: All full-time, and regular part-time, per diem RN and Technical employees, employed by the employer at its facilities in the San Fernando Valley Region listed in 2b.

Excluded: All other employees, managers, confidential employees, guards, physicians, service, office clericals and supervisors as defined by the Act.

6a. No. of Employees in Unit: 115

6b. Do a substantial number (30% or more) of the employees in the unit wish to be represented by the Petitioner? Yes [✓] No [ ]

Check One:
[✓] 7a. Request for recognition as Bargaining Representative was made on (Date) 10/11/2017 and Employer declined recognition on or about 10/11/2017 (Date) (If no reply received, so state).
[ ] 7b. Petitioner is currently recognized as Bargaining Representative and desires certification under the Act.

8a. Name of Recognized or Certified Bargaining Agent (If none, so state).	8b. Address
none	

8c. Tel No.	8d Cell No.	8e. Fax No.	8f. E-Mail Address

8g. Affiliation, if any	8h. Date of Recognition or Certification	8i. Expiration Date of Current or Most Recent Contract, if any (Month, Day, Year)

9. Is there now a strike or picketing at the Employer's establishment(s) involved? no if so, approximately how many employees are participating? _____
(Name of labor organization) _____, has picketed the Employer since (Month, Day, Year) _____

10. Organizations or individuals other than Petitioner and those named in items 8 and 9, which have claimed recognition as representatives and other organizations and individuals known to have a representative interest in any employees in the unit described in item 5b above. (If none, so state)
none

10a. Name	10b. Address	10c. Tel. No.	10d. Cell No.
		10e. Fax No.	10f. E-Mail Address

11. Election Details: If the NLRB conducts an election in this matter, state your position with respect to any such election.

11a. Election Type: [ ] Manual [✓] Mail [ ] Mixed Manual/Mail

11b. Election Date(s):	11c. Election Time(s):	11d. Election Location(s):
~~11/7/17~~ 11/7/17-11/21/17		

12a. Full Name of Petitioner (including local name and number)	12b. Address (street and number, city, state, and ZIP code)
National Union of Healthcare Workers	5801 Christie Ave. Suite 525, Emeryville, CA 94608

12c. Full name of national or international labor organization of which Petitioner is an affiliate or constituent (if none, so state)
none

12d. Tel No.	12e. Cell No.	12f. Fax No.	12g. E-Mail Address
(510) 834-2017			

13. Representative of the Petitioner who will accept service of all papers for purposes of the representation proceeding.

13a. Name and Title	13b. Address (street and number, city, state, and ZIP code)
Sophia Mendoza, Organizer	225 W. Broadway, Suite 155, Glendale, CA 91204

13c. Tel No.	13d. Cell No.	13e. Fax No.	13f. E-Mail Address
	(213) 280-0051	(818) 241-0141	smendoza@nuhw.org

I declare that I have read the above petition and that the statements are true to the best of my knowledge and belief.

Name (Print)	Signature	Title	Date
Florice Hoffman	Florice Hoffman	Attorney	10/24/17

WILLFUL FALSE STATEMENTS ON THIS PETITION CAN BE PUNISHED BY FINE AND IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001)

PRIVACY ACT STATEMENT

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Radnet SFV RC petition Attachments:

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5a.
Burbank, CA
Encino, CA
Glendale, CA
Panorama City, CA
Pasadena, CA
Reseda, CA
Tarzana, CA
Toluca Lake, CA
Valencia, CA
Van Nuys, CA
West Hills, CA

E.Ex. 4

FORM NLRB-32

SUBPOENA

UNITED STATES OF AMERICA
NATIONAL LABOR RELATIONS BOARD

To Custodian of Records, Los Angeles Police Department, Discovery Unit, 200 N. Spring Street, 19th Floor, Los Angeles, CA 90012

As requested by RadNet Management, Inc. d/b/a San Fernando Valley Interventional Radiology and Imaging Center

whose address is 16311 Ventura Blvd., Suite 120, Encino, CA 91436
(Street) (City) (State) (ZIP)

YOU ARE HEREBY REQUIRED AND DIRECTED TO APPEAR BEFORE a Hearing Officer _____ of the National Labor Relations Board

at 11500 W. Olympic Blvd., Suite 600

in the City of Los Angeles

on January 29, 2018 at 9:00 am or any adjourned

or rescheduled date to testify in RadNet Management, Inc. d/b/a San Fernando Valley Interventional Radiology and Imaging Center (31-RM-209388) and RadNet Management, Inc. d/b/a San Fernando Valley Advanced Imaging Center (31-RM-209424)
(Case Name and Number)

If you do not intend to comply with the subpoena, within 5 days (excluding intermediate Saturdays, Sundays, and holidays) after the date the subpoena is received, you must petition in writing to revoke the subpoena. Unless filed through the Board's E-Filing system, the petition to revoke must be received on or before the official closing time of the receiving office on the last day for filing. If filed through the Board's E-Filing system, it may be filed up to 11:59 pm in the local time zone of the receiving office on the last day for filing. Prior to a hearing, the petition to revoke should be filed with the Regional Director; during a hearing, it should be filed with the Hearing Officer or Administrative Law Judge conducting the hearing. See Board's Rules and Regulations, 29 C.F.R Section 102.31(b) (unfair labor practice proceedings) and/or 29 C.F.R. Section 102.66(c) (representation proceedings) and 29 C.F.R Section 102.111(a)(1) and 102.111(b)(3) (time computation). Failure to follow these rules may result in the loss of any ability to raise objections to the subpoena in court.

A-1-ZP9HUZ

Under the seal of the National Labor Relations Board, and by direction of the Board, this Subpoena is

Issued at Los Angeles, CA

Dated: January 17, 2018

Marvin Kaplan, Chairman

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Case 31-RM-209388

A-1-ZP9HUZ

RETURN OF SERVICE

I certify that, being a person over 18 years of age, I duly served a copy of this subpoena

(Check method used.)

- ☐ by person
- ☐ by certified mail
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- ☐ by telegraph
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_____

_____

_____

on the named person on

_____

(Month, day, and year)

_____

(Name of person making service)

_____

(Official title, if any)

CERTIFICATION OF SERVICE

I certify that named person was in attendance as a witness at

_____

on

(Month, day or days, and year)

_____

(Name of person certifying)

_____

(Official title)

FORM NLRB-32

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_____

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on the named person on

_____

(Month, day, and year)

_____

(Name of person making service)

_____

(Official title, if any)

CERTIFICATION OF SERVICE

I certify that named person was in attendance as a witness at

_____

on

(Month, day or days, and year)

_____

(Name of person certifying)

_____

(Official title)

FORM NLRB-31

SUBPOENA DUCES TECUM

UNITED STATES OF AMERICA
NATIONAL LABOR RELATIONS BOARD

To Custodian of Records, Los Angeles Police Department, Discovery Unit, 200 N. Spring Street, 19th Floor, Los Angeles, CA 90012

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whose address is 14860 Roscoe Blvd., Suite 101, Panorama City, CA 91402
(Street) (City) (State) (ZIP)

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or rescheduled date to testify in RadNet Management, Inc. d/b/a San Fernando Valley Interventional Radiology and Imaging Center (31-RM-209388) and RadNet Management, Inc. d/b/a San Fernando Valley Advanced Imaging Center (31-RM-209424)
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B-1-ZPBEKV

Under the seal of the National Labor Relations Board, and by direction of the Board, this Subpoena is

Issued at Los Angeles, CA

Dated: January 17, 2018

Marvin Kaplan, Chairman

NOTICE TO WITNESS. Witness fees for attendance, subsistence, and mileage under this subpoena are payable by the party at whose request the witness is subpoenaed. A witness appearing at the request of the General Counsel of the National Labor Relations Board shall submit this subpoena with the voucher when claiming reimbursement.

PRIVACY ACT STATEMENT

Solicitation of the information on this form is authorized by the National Labor Relations Act (NLRA), 29 U.S.C. § 151 *et seq.* The principal use of the information is to assist the National Labor Relations Board (NLRB) in processing representation and/or unfair labor practice proceedings and related proceedings or litigation. The routine uses for the information are fully set forth in the Federal Register, 71 Fed. Reg. 74942-43 (Dec. 13, 2006). The NLRB will further explain these uses upon request. Disclosure of this information to the NLRB is mandatory in that failure to supply the information may cause the NLRB to seek enforcement of the subpoena in federal court.

Case 31-RM-209388

B-1-ZPBEKV

RETURN OF SERVICE

I certify that, being a person over 18 years of age, I duly served a copy of this subpoena

(Check method used.)

- ☐ by person
- ☐ by certified mail
- ☐ by registered mail
- ☐ by telegraph
- ☐ by leaving copy at principal office or place of business at

_____

_____

_____

on the named person on

_____

(Month, day, and year)

_____

(Name of person making service)

_____

(Official title, if any)

CERTIFICATION OF SERVICE

I certify that named person was in attendance as a witness at

_____

on

(Month, day or days, and year)

_____

(Name of person certifying)

_____

(Official title)

UNITED STATES OF AMERICA
NATIONAL LABOR RELATIONS BOARD
REGION 31

RADNET MANAGEMENT, INC. D/B/A SAN FERNANDO VALLEY ADVANCED IMAGING CENTER Petitioner *and* NATIONAL UNION OF HEALTHCARE WORKERS Labor Organization	Case No. 31-RM-209424

ATTACHMENT TO SUBPOENA *DUCES TECUM* NO. B-1-ZPBEKV

By service of Subpoena *Duces Tecum* No. B-1-ZPBEKV, RadNet Management, Inc. d/b/a San Fernando Valley Advanced Imaging Center (hereafter, "RadNet") hereby seeks production of all requested documents within your possession, custody or control without regard to who has physical possession of them or who prepared the documents, and wherever retained.

Documents produced should be grouped and in the order that they are maintained in the normal course, and should include all files and file labels in which the documents, and extra copies of them, are located.

For any document withheld on a claim of privilege and/or under the work-product doctrine or any other claimed immunity from production,

identify the date, author, recipients, title, general nature and privilege and / or immunity claimed.

If additional documents are discovered that fall within the terms of this request, the additional items shall be produced immediately.

DEFINITIONS

1.) "Documents," as used below, includes all material defined in Rule 34 of the Federal Rules of Civil Procedure, and are not limited to the specific examples listed, and further includes any written document of any nature whatsoever (*including but not limited to any emails or text messages*), any audio-tape, any video-tape, or any repository of any electronic data, such as computer hard drives or memory cards of portable communication devices.

2.) "Los Angeles Police Department," as used below, refers to the Los Angeles Police Department and any other associated or affiliated law enforcement entities, including but not limited to any Sheriff's Departments, Regional Offices, and County Offices, together with all current and former officers and employees thereof, and/or any outside persons or entities retained to act on their behalf.

DOCUMENTS TO BE PRODUCED

1.) Any and all documents, including but not limited to any call logs, reports, notes, memoranda, or email messages related to any investigation of, or any contact by the Los Angeles Police Department in connection with, the following named individuals, from August 1, 2017 through December 31, 2017:

a.

b.

c.

d.

e.

2.) Any and all documents, including but not limited to any call logs, reports, notes, memoranda, or email messages related to any investigation of, or any contact by the Los Angeles Police Department in connection with, the following addresses, from August 1, 2017 through December 31, 2017:

a.

b.

c.

d.

3.) From August 1, 2017 through December 31, 2017, any and all documents, including but not limited to any call logs, reports, notes, memoranda, or email messages, related to any actions taken by the Los Angeles Police Department, including but not limited to any investigations, on the basis of a report, telephone call or other communication received from an individual identifying themselves as Sophia Mendoza.

4.) From August 1, 2017 through December 31, 2017, any and all documents, including but not limited to any call logs, reports, memoranda, or email messages, related to any actions taken by the Los Angeles Police Department, including but not limited to any investigations, on the basis of a report, telephone call or other communication received from an individual identifying themselves as Ryan Carrillo.

5.) From August 1, 2017 through December 31, 2017, any and all documents, including but not limited to any call logs, reports, notes, memoranda, or email messages, related to any actions taken by the Los Angeles Police Department, including but not limited to any investigations, on the basis of a report, telephone call or other communication received from any individual who identified

themselves as a member of the National United Healthcare Workers Union.

6.) From August 1, 2017 through December 31, 2017, any and all documents, including but not limited to any call logs, reports, memoranda, or email messages, related to any actions taken by the Los Angeles Police Department, including but not limited to any investigations, on the basis of a report, telephone call or other communication received from any individual who identified themselves as a member of the International Association of Machinists and Aerospace Workers.

FORM NLRB-31

SUBPOENA DUCES TECUM

UNITED STATES OF AMERICA
NATIONAL LABOR RELATIONS BOARD

To Custodian of Records, Los Angeles Police Department, Discovery Unit, 200 N. Spring Street, 19th Floor, Los Angeles, CA 90012

As requested by RadNet Management, Inc. d/b/a San Fernando Valley Interventional Radiology and Imaging Center

whose address is 16311 Ventura Blvd., Suite 120, Encino, CA 91436
(Street) (City) (State) (ZIP)

YOU ARE HEREBY REQUIRED AND DIRECTED TO APPEAR BEFORE a Hearing Officer _____

of the National Labor Relations Board

at 11500 W. Olympic Blvd., Suite 600

in the City of Los Angeles

on January 29, 2018 at 9:00 am or any adjourned

or rescheduled date to testify in RadNet Management, Inc. d/b/a San Fernando Valley Interventional Radiology and Imaging Center (31-RM-209388) and RadNet Management, Inc. d/b/a San Fernando Valley Advanced Imaging Center (31-RM-209424)
(Case Name and Number)

And you are hereby required to bring with you and produce at said time and place the following books, records, correspondence, and documents:

SEE ATTACHMENT

If you do not intend to comply with the subpoena, within 5 days (excluding intermediate Saturdays, Sundays, and holidays) after the date the subpoena is received, you must petition in writing to revoke the subpoena. Unless filed through the Board's E-Filing system, the petition to revoke must be received on or before the official closing time of the receiving office on the last day for filing. If filed through the Board's E-Filing system, it may be filed up to 11:59 pm in the local time zone of the receiving office on the last day for filing. Prior to a hearing, the petition to revoke should be filed with the Regional Director; during a hearing, it should be filed with the Hearing Officer or Administrative Law Judge conducting the hearing. See Board's Rules and Regulations, 29 C.F.R Section 102.31(b) (unfair labor practice proceedings) and/or 29 C.F.R. Section 102.66(c) (representation proceedings) and 29 C.F.R Section 102.111(a)(1) and 102.111(b)(3) (time computation). Failure to follow these rules may result in the loss of any ability to raise objections to the subpoena in court.

B-1-ZPB555

Under the seal of the National Labor Relations Board, and by direction of the Board, this Subpoena is

Issued at Los Angeles, CA

Dated: January 17, 2018

Marvin Kaplan, Chairman

NOTICE TO WITNESS. Witness fees for attendance, subsistence, and mileage under this subpoena are payable by the party at whose request the witness is subpoenaed. A witness appearing at the request of the General Counsel of the National Labor Relations Board shall submit this subpoena with the voucher when claiming reimbursement.

PRIVACY ACT STATEMENT

Solicitation of the information on this form is authorized by the National Labor Relations Act (NLRA), 29 U.S.C. § 151 *et seq.* The principal use of the information is to assist the National Labor Relations Board (NLRB) in processing representation and/or unfair labor practice proceedings and related proceedings or litigation. The routine uses for the information are fully set forth in the Federal Register, 71 Fed. Reg. 74942-43 (Dec. 13, 2006). The NLRB will further explain these uses upon request. Disclosure of this information to the NLRB is mandatory in that failure to supply the information may cause the NLRB to seek enforcement of the subpoena in federal court.

Case 31-RM-209388

B-1-ZPB555

RETURN OF SERVICE

I certify that, being a person over 18 years of age, I duly served a copy of this subpoena

(Check method used.)

- ☐ by person
- ☐ by certified mail
- ☐ by registered mail
- ☐ by telegraph
- ☐ by leaving copy at principal office or place of business at

_____

_____

_____

on the named person on

_____

(Month, day, and year)

_____

(Name of person making service)

_____

(Official title, if any)

CERTIFICATION OF SERVICE

I certify that named person was in attendance as a witness at

_____

on

(Month, day or days, and year)

_____

(Name of person certifying)

_____

(Official title)

UNITED STATES OF AMERICA
NATIONAL LABOR RELATIONS BOARD
REGION 31

RADNET MANAGEMENT, INC. D/B/A SAN FERNANDO VALLEY INTERVENTIONAL RADIOLOGY AND IMAGING CENTER Petitioner *and* NATIONAL UNION OF HEALTHCARE WORKERS Labor Organization	Case No. 31-RM-209388

ATTACHMENT TO SUBPOENA *DUCES TECUM* NO. B-1-ZPB555

By service of Subpoena *Duces Tecum* No. B-1-ZPB555, RadNet Management, Inc. d/b/a San Fernando Valley Interventional Radiology and Imaging Center (hereafter, "RadNet") hereby seeks production of all requested documents within your possession, custody or control without regard to who has physical possession of them or who prepared the documents, and wherever retained.

Documents produced should be grouped and in the order that they are maintained in the normal course, and should include all files and file labels in which the documents, and extra copies of them, are located.

For any document withheld on a claim of privilege and/or under the work-product doctrine or any other claimed immunity from production, identify the date, author, recipients, title, general nature and privilege and / or immunity claimed.

If additional documents are discovered that fall within the terms of this request, the additional items shall be produced immediately.

DEFINITIONS

1.) "Documents," as used below, includes all material defined in Rule 34 of the Federal Rules of Civil Procedure, and are not limited to the specific examples listed, and further includes any written document of any nature whatsoever (*including but not limited to any emails or text messages*), any audio-tape, any video-tape, or any repository of any electronic data, such as computer hard drives or memory cards of portable communication devices.

2.) "Los Angeles Police Department," as used below, refers to the Los Angeles Police Department and any other associated or affiliated law enforcement entities, including but not limited to any Sheriff's Departments, Regional Offices, and County Offices, together with all current and former officers and employees thereof, and/or any outside persons or entities retained to act on their behalf.

DOCUMENTS TO BE PRODUCED

1.) Any and all documents, including but not limited to any call logs, reports, notes, memoranda, or email messages related to any investigation of, or any contact by the Los Angeles Police Department in connection with, the following named individuals, from August 1, 2017 through December 31, 2017:

a.

b.

c.

d.

e.

2.) Any and all documents, including but not limited to any call logs, reports, notes, memoranda, or email messages related to any investigation of, or any contact by the Los Angeles Police Department in connection with, the following addresses, from August 1, 2017 through December 31, 2017:

a.

b.

c.

d.

3.) From August 1, 2017 through December 31, 2017, any and all documents, including but not limited to any call logs, reports, notes, memoranda, or email messages, related to any actions taken by the Los Angeles Police Department, including but not limited to any investigations, on the basis of a report, telephone call or other communication received from an individual identifying themselves as Sophia Mendoza.

4.) From August 1, 2017 through December 31, 2017, any and all documents, including but not limited to any call logs, reports, memoranda, or email messages, related to any actions taken by the Los Angeles Police Department, including but not limited to any investigations, on the basis of a report, telephone call or other communication received from an individual identifying themselves as Ryan Carrillo.

5.) From August 1, 2017 through December 31, 2017, any and all documents, including but not limited to any call logs, reports, notes, memoranda, or email messages, related to any actions taken by the Los Angeles Police Department, including but not limited to any investigations, on the basis of a report, telephone call or other communication received from any individual who identified

themselves as a member of the National United Healthcare Workers Union.

6.) From August 1, 2017 through December 31, 2017, any and all documents, including but not limited to any call logs, reports, memoranda, or email messages, related to any actions taken by the Los Angeles Police Department, including but not limited to any investigations, on the basis of a report, telephone call or other communication received from any individual who identified themselves as a member of the International Association of Machinists and Aerospace Workers.

Emp. Ex. 5

Staff that worked on RadNet SFI and SFP:

1. Sophia Mendoza – 225 W. Broadway, Suite 155, Glendale, CA 91204
2. Cristian Murguia – 225 W. Broadway, Suite 155, Glendale, CA 91204
3. Ryan Carrillo – 225 W. Broadway, Suite 155, Glendale, CA 91204
4. Keegan Cox – 225 W. Broadway, Suite 155, Glendale, CA 91204

Emp. Ex. 6

January 29, 2018

Custodian of Records
Los Angeles Police Department
Discovery Unit
200 N. Spring Street, 19th Floor
Los Angeles, CA 90012

RE: RadNet Management, Inc. d/b/a San Fernando Valley Interventional Radiology & Imaging Center; NLRB Case No. 31-RM-209388 and RadNet Management, Inc. d/b/a San Fernando Valley Advanced Imaging Center; NLRB Case No. 31-RM-209424

To Whom It May Concern,

I represent RadNet Management, Inc. d/b/a San Fernando Valley Interventional Radiology & Imaging Center and RadNet Management, Inc. d/b/a San Fernando Valley Advanced Imaging Center (hereafter, the "Employers") in connection with the above-referenced cases before Region 31 of the National Labor Relations Board. Attached please find four Subpoenas being served upon the Los Angeles Police Department by the Employers in connection with the two above-referenced cases. As you know, on January 26, 2018, you were served with four subpoenas by the Employers in connection with the above-referenced cases, but you failed to appear on January 29, 2018 as requested in those subpoenas. Accordingly, the Employers trust that the mileage reimbursement accompanying the subpoenas previously served upon you will be utilized to reimburse you for your travel to the hearing on January 30, 2018 or any subsequent date, if the hearing is continued. If you have questions about the Subpoenas or the Los Angeles Police Department's compliance with the Subpoenas, please contact me at (860) 307-3223.

Carmody & Carmody LLP, 415 King Street, Mount Pleasant, SC 29464
O. (843) 284-9684 C. (860) 307-3223
kkaseta@carmodyandcarmody.com

Sincerely,

Kaitlin A. Kaseta
Counsel for the Employers
(860) 307-3223
(843) 284-9684
kkaseta@carmodyandcarmody.com

FORM NLRB-32

SUBPOENA

UNITED STATES OF AMERICA
NATIONAL LABOR RELATIONS BOARD

To Custodian of Records, Los Angeles Police Department, Discovery Unit, 200 Spring Street, 19th Floor, Los Angeles, CA 90012

As requested by RadNet Management, Inc. d/b/a San Fernando Valley Advanced Imaging Center

whose address is 14860 Roscoe Blvd, Suite 101, Panorama City CA 91402
(Street) (City) (State) (ZIP)

YOU ARE HEREBY REQUIRED AND DIRECTED TO APPEAR BEFORE a Hearing Officer of the National Labor Relations Board

at 11500 West Olympic Blvd, Suite 1600

in the City of Los Angeles

on January 30, 2018 at 9:00 am or any adjourned

or rescheduled date to testify in RadNet Management, Inc. d/b/a San Fernando Valley Interventional Radiology and Imaging Center and RadNet Management, Inc. d/b/a San Fernando Valley Advanced Imaging Center Cases 31-RM-209388 and 31-RM-209424
(Case Name and Number)

If you do not intend to comply with the subpoena, within 5 days (excluding intermediate Saturdays, Sundays, and holidays) after the date the subpoena is received, you must petition in writing to revoke the subpoena. Unless filed through the Board's E-Filing system, the petition to revoke must be received on or before the official closing time of the receiving office on the last day for filing. If filed through the Board's E-Filing system, it may be filed up to 11:59 pm in the local time zone of the receiving office on the last day for filing. Prior to a hearing, the petition to revoke should be filed with the Regional Director; during a hearing, it should be filed with the Hearing Officer or Administrative Law Judge conducting the hearing. See Board's Rules and Regulations, 29 C.F.R Section 102.31(b) (unfair labor practice proceedings) and/or 29 C.F.R. Section 102.66(c) (representation proceedings) and 29 C.F.R Section 102.111(a)(1) and 102.111(b)(3) (time computation). Failure to follow these rules may result in the loss of any ability to raise objections to the subpoena in court.

A-1-ZUM7ZR

Under the seal of the National Labor Relations Board, and by direction of the Board, this Subpoena is

Issued at

Dated:

Marvin Kaplan, Chairman

NOTICE TO WITNESS. Witness fees for attendance, subsistence, and mileage under this subpoena are payable by the party at whose request the witness is subpoenaed. A witness appearing at the request of the General Counsel of the National Labor Relations Board shall submit this subpoena with the voucher when claiming reimbursement.

PRIVACY ACT STATEMENT

Solicitation of the information on this form is authorized by the National Labor Relations Act (NLRA), 29 U.S.C. § 151 *et seq.* The principal use of the information is to assist the National Labor Relations Board (NLRB) in processing representation and/or unfair labor practice proceedings and related proceedings or litigation. The routine uses for the information are fully set forth in the Federal Register, 71 Fed. Reg. 74942-43 (Dec. 13, 2006). The NLRB will further explain these uses upon request. Disclosure of this information to the NLRB is mandatory in that failure to supply the information may cause the NLRB to seek enforcement of the subpoena in federal court.

Case 31-RM-209388

A-1-ZUM7ZR

RETURN OF SERVICE

I certify that, being a person over 18 years of age, I duly served a copy of this subpoena

(Check method used.)

- ☐ by person
- ☐ by certified mail
- ☐ by registered mail
- ☐ by telegraph
- ☐ by leaving copy at principal office or place of business at

_____

_____

_____

on the named person on

_____

(Month, day, and year)

_____

(Name of person making service)

_____

(Official title, if any)

CERTIFICATION OF SERVICE

I certify that named person was in attendance as a witness at

_____

on

(Month, day or days, and year)

_____

(Name of person certifying)

_____

(Official title)

FORM NLRB-32

SUBPOENA

UNITED STATES OF AMERICA
NATIONAL LABOR RELATIONS BOARD

To Custodian of Records, Los Angeles Police Department, Discovery Unit, 200 N. Spring Street, 19th Floor, Los Angeles, CA 90012

As requested by RadNet Management, Inc. d/b/a San Fernando Valley Interventional Radiology + Imaging Center

whose address is 16311 Ventura Blvd, Suite 120, Encino CA 91436
(Street) (City) (State) (ZIP)

YOU ARE HEREBY REQUIRED AND DIRECTED TO APPEAR BEFORE a Hearing Officer

of the National Labor Relations Board

at 11500 West Olympic Blvd, Suite 600

in the City of Los Angeles

on January 30, 2018 at 9:00 am or any adjourned

or rescheduled date to testify in RadNet Management, Inc. d/b/a San Fernando Valley Interventional Radiology and Imaging Center and RadNet Management, Inc. d/b/a San Fernando Valley Advanced Imaging Center
Cases 31-RM-209388 and 31-RM-209424
(Case Name and Number)

If you do not intend to comply with the subpoena, within 5 days (excluding intermediate Saturdays, Sundays, and holidays) after the date the subpoena is received, you must petition in writing to revoke the subpoena. Unless filed through the Board's E-Filing system, the petition to revoke must be received on or before the official closing time of the receiving office on the last day for filing. If filed through the Board's E-Filing system, it may be filed up to 11:59 pm in the local time zone of the receiving office on the last day for filing. Prior to a hearing, the petition to revoke should be filed with the Regional Director; during a hearing, it should be filed with the Hearing Officer or Administrative Law Judge conducting the hearing. See Board's Rules and Regulations, 29 C.F.R Section 102.31(b) (unfair labor practice proceedings) and/or 29 C.F.R. Section 102.66(c) (representation proceedings) and 29 C.F.R Section 102.111(a)(1) and 102.111(b)(3) (time computation). Failure to follow these rules may result in the loss of any ability to raise objections to the subpoena in court.

A-1-ZUMBIP

Under the seal of the National Labor Relations Board, and by direction of the Board, this Subpoena is

Issued at

Dated:

Marvin Kaplan, Chairman

NOTICE TO WITNESS. Witness fees for attendance, subsistence, and mileage under this subpoena are payable by the party at whose request the witness is subpoenaed. A witness appearing at the request of the General Counsel of the National Labor Relations Board shall submit this subpoena with the voucher when claiming reimbursement.

PRIVACY ACT STATEMENT

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Case 31-RM-209388

A-1-ZUMBIP

RETURN OF SERVICE

I certify that, being a person over 18 years of age, I duly served a copy of this subpoena

(Check method used.)

- ☐ by person
- ☐ by certified mail
- ☐ by registered mail
- ☐ by telegraph
- ☐ by leaving copy at principal office or place of business at

_____

_____

_____

on the named person on

_____

(Month, day, and year)

_____

(Name of person making service)

_____

(Official title, if any)

CERTIFICATION OF SERVICE

I certify that named person was in attendance as a witness at

_____

on

(Month, day or days, and year)

_____

(Name of person certifying)

_____

(Official title)

FORM NLRB-31

SUBPOENA DUCES TECUM

UNITED STATES OF AMERICA
NATIONAL LABOR RELATIONS BOARD

To Custodian of Records, Los Angeles Police Department, Discovery Unit, 200 North Spring Street, 19th Floor, Los Angeles, CA 90012

As requested by RadNet Management Inc. d/b/a San Fernando Valley Adv. Imaging Ctr.

whose address is 14860 Roscoe Blvd, Suite 101 Panorama City CA 91402
(Street) (City) (State) (ZIP)

YOU ARE HEREBY REQUIRED AND DIRECTED TO APPEAR BEFORE a Hearing Officer

of the National Labor Relations Board

at 11500 W. Olympic Blvd., Suite 600

in the City of Los Angeles

on January 30, 2018 at 9:00 am or any adjourned

or rescheduled date to testify in RadNet Management, Inc. d/b/a San Fernando Valley Interventional Radiology and Imaging Center and RadNet Management, Inc. d/b/a San Fernando Valley Advanced Imaging Center
Cases 31-RM-209388 and 31-RM-209424
(Case Name and Number)

And you are hereby required to bring with you and produce at said time and place the following books, records, correspondence, and documents:

SEE ATTACHMENT

If you do not intend to comply with the subpoena, within 5 days (excluding intermediate Saturdays, Sundays, and holidays) after the date the subpoena is received, you must petition in writing to revoke the subpoena. Unless filed through the Board's E-Filing system, the petition to revoke must be received on or before the official closing time of the receiving office on the last day for filing. If filed through the Board's E-Filing system, it may be filed up to 11:59 pm in the local time zone of the receiving office on the last day for filing. Prior to a hearing, the petition to revoke should be filed with the Regional Director; during a hearing, it should be filed with the Hearing Officer or Administrative Law Judge conducting the hearing. See Board's Rules and Regulations, 29 C.F.R Section 102.31(b) (unfair labor practice proceedings) and/or 29 C.F.R. Section 102.66(c) (representation proceedings) and 29 C.F.R Section 102.111(a)(1) and 102.111(b)(3) (time computation). Failure to follow these rules may result in the loss of any ability to raise objections to the subpoena in court.

B-1-ZUMHQB

Under the seal of the National Labor Relations Board, and by direction of the Board, this Subpoena is

Issued at

Dated:

Marvin Kaplan, Chairman

NOTICE TO WITNESS. Witness fees for attendance, subsistence, and mileage under this subpoena are payable by the party at whose request the witness is subpoenaed. A witness appearing at the request of the General Counsel of the National Labor Relations Board shall submit this subpoena with the voucher when claiming reimbursement.

PRIVACY ACT STATEMENT

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Case 31-RM-209388

B-1-ZUMHQB

RETURN OF SERVICE

I certify that, being a person over 18 years of age, I duly served a copy of this subpoena

(Check method used.)

- ☐ by person
- ☐ by certified mail
- ☐ by registered mail
- ☐ by telegraph
- ☐ by leaving copy at principal office or place of business at

_____

_____

_____

on the named person on

_____

(Month, day, and year)

_____

(Name of person making service)

_____

(Official title, if any)

CERTIFICATION OF SERVICE

I certify that named person was in attendance as a witness at

_____

on

(Month, day or days, and year)

_____

(Name of person certifying)

_____

(Official title)

UNITED STATES OF AMERICA
NATIONAL LABOR RELATIONS BOARD
REGION 31

RADNET MANAGEMENT, INC. D/B/A SAN FERNANDO VALLEY ADVANCED IMAGING CENTER Petitioner *and* NATIONAL UNION OF HEALTHCARE WORKERS Labor Organization	Case No. 31-RM-209424

ATTACHMENT TO SUBPOENA *DUCES TECUM* NO. B-1-ZUMHQB

By service of Subpoena *Duces Tecum* No. B-1-ZUMHQB, RadNet Management, Inc. d/b/a San Fernando Valley Advanced Imaging Center (hereafter, "RadNet") hereby seeks production of all requested documents within your possession, custody or control without regard to who has physical possession of them or who prepared the documents, and wherever retained.

Documents produced should be grouped and in the order that they are maintained in the normal course, and should include all files and file labels in which the documents, and extra copies of them, are located.

For any document withheld on a claim of privilege and/or under the work-product doctrine or any other claimed immunity from production, identify the date, author, recipients, title, general nature and privilege and / or immunity claimed.

If additional documents are discovered that fall within the terms of this request, the additional items shall be produced immediately.

DEFINITIONS

1.) "Documents," as used below, includes all material defined in Rule 34 of the Federal Rules of Civil Procedure, and are not limited to the specific examples listed, and further includes any written document of any nature whatsoever (*including but not limited to any emails or text messages*), any audio-tape, any video-tape, or any repository of any electronic data, such as computer hard drives or memory cards of portable communication devices.

2.) "Los Angeles Police Department," as used below, refers to the Los Angeles Police Department and any other associated or affiliated law enforcement entities, including but not limited to any Sheriff's Departments, Regional Offices, and County Offices, together with all current and former officers and employees thereof, and/or any outside persons or entities retained to act on their behalf.

DOCUMENTS TO BE PRODUCED

1.) From August 1, 2017 through December 31, 2017, any and all documents, including but not limited to any call logs, reports, notes, memoranda, or email messages, related to any actions taken by the Los Angeles Police Department, including but not limited to any investigations, on the basis of a report, telephone call or other communication received from an individual identifying themselves as Keegan Cox.

2.) From August 1, 2017 through December 31, 2017, any and all documents, including but not limited to any call logs, reports, memoranda, or email messages, related to any actions taken by the Los Angeles Police Department, including but not limited to any investigations, on the basis of a report, telephone call or other communication received from an individual identifying themselves as Cristian Murguia.

3.) From August 1, 2017 through December 31, 2017, any and all documents, including but not limited to any call logs, reports, memoranda, or email messages, related to any actions taken by the

Los Angeles Police Department, including but not limited to any investigations, on the basis of a report, telephone call or other communication received from an individual identifying themselves as Pieter Clayton or Pete Clayton.

4.) From August 1, 2017 through December 31, 2017, any and all documents, including but not limited to any call logs, reports, memoranda, or email messages, related to any actions taken by the Los Angeles Police Department, including but not limited to any investigations, on the basis of a report, telephone call or other communication received from an individual identifying themselves as Joseph Solis or Joe Solis.

FORM NLRB-31

SUBPOENA DUCES TECUM

UNITED STATES OF AMERICA
NATIONAL LABOR RELATIONS BOARD

To Custodian of Records, Los Angeles Police Department, Discovery Unit, 200 N. Spring Street, 19th Floor, Los Angeles, CA 90012

As requested by RadNet Management, Inc. d/b/a San Fernando Valley Intervent. Radiol and Imaging Ctr.

whose address is 16311 Ventura Blvd, Suite 120, Encino, CA 91436
(Street) (City) (State) (ZIP)

YOU ARE HEREBY REQUIRED AND DIRECTED TO APPEAR BEFORE a Hearing Officer

of the National Labor Relations Board

at 11500 W. Olympic Blvd, Suite 1600

in the City of Los Angeles

on January 30, 2018 at 9:00 am or any adjourned

or rescheduled date to testify in RadNet Management, Inc. d/b/a San Fernando Valley Interventional Radiology and Imaging Center and RadNet Management, Inc. d/b/a San Fernando Valley Advanced Imaging Center Cases 31-RM-209388 and 31-RM-209424
(Case Name and Number)

And you are hereby required to bring with you and produce at said time and place the following books, records, correspondence, and documents:

SEE ATTACHMENT

If you do not intend to comply with the subpoena, within 5 days (excluding intermediate Saturdays, Sundays, and holidays) after the date the subpoena is received, you must petition in writing to revoke the subpoena. Unless filed through the Board's E-Filing system, the petition to revoke must be received on or before the official closing time of the receiving office on the last day for filing. If filed through the Board's E-Filing system, it may be filed up to 11:59 pm in the local time zone of the receiving office on the last day for filing. Prior to a hearing, the petition to revoke should be filed with the Regional Director; during a hearing, it should be filed with the Hearing Officer or Administrative Law Judge conducting the hearing. See Board's Rules and Regulations, 29 C.F.R Section 102.31(b) (unfair labor practice proceedings) and/or 29 C.F.R. Section 102.66(c) (representation proceedings) and 29 C.F.R Section 102.111(a)(1) and 102.111(b)(3) (time computation). Failure to follow these rules may result in the loss of any ability to raise objections to the subpoena in court.

B-1-ZUMIG5

Under the seal of the National Labor Relations Board, and by direction of the Board, this Subpoena is

Issued at

Dated:

Marvin Kaplan, Chairman

NOTICE TO WITNESS. Witness fees for attendance, subsistence, and mileage under this subpoena are payable by the party at whose request the witness is subpoenaed. A witness appearing at the request of the General Counsel of the National Labor Relations Board shall submit this subpoena with the voucher when claiming reimbursement.

PRIVACY ACT STATEMENT

Solicitation of the information on this form is authorized by the National Labor Relations Act (NLRA), 29 U.S.C. § 151 *et seq.* The principal use of the information is to assist the National Labor Relations Board (NLRB) in processing representation and/or unfair labor practice proceedings and related proceedings or litigation. The routine uses for the information are fully set forth in the Federal Register, 71 Fed. Reg. 74942-43 (Dec. 13, 2006). The NLRB will further explain these uses upon request. Disclosure of this information to the NLRB is mandatory in that failure to supply the information may cause the NLRB to seek enforcement of the subpoena in federal court.

Case 31-RM-209388

B-1-ZUMIG5

RETURN OF SERVICE

I certify that, being a person over 18 years of age, I duly served a copy of this subpoena

(Check method used.)

- ☐ by person
- ☐ by certified mail
- ☐ by registered mail
- ☐ by telegraph
- ☐ by leaving copy at principal office or place of business at

_____

_____

_____

on the named person on

_____

(Month, day, and year)

_____

(Name of person making service)

_____

(Official title, if any)

CERTIFICATION OF SERVICE

I certify that named person was in attendance as a witness at

_____

on

(Month, day or days, and year)

_____

(Name of person certifying)

_____

(Official title)

UNITED STATES OF AMERICA
NATIONAL LABOR RELATIONS BOARD
REGION 31

RADNET MANAGEMENT, INC. D/B/A SAN FERNANDO VALLEY INTERVENTIONAL RADIOLOGY AND IMAGING CENTER Petitioner *and* NATIONAL UNION OF HEALTHCARE WORKERS Labor Organization	Case No. 31-RM-209388

ATTACHMENT TO SUBPOENA *DUCES TECUM* NO. B-1-ZUMIG5

By service of Subpoena *Duces Tecum* No. B-1-ZUMIG5, RadNet Management, Inc. d/b/a San Fernando Valley Interventional Radiology and Imaging Center (hereafter, "RadNet") hereby seeks production of all requested documents within your possession, custody or control without regard to who has physical possession of them or who prepared the documents, and wherever retained.

Documents produced should be grouped and in the order that they are maintained in the normal course, and should include all files and file labels in which the documents, and extra copies of them, are located.

For any document withheld on a claim of privilege and/or under the work-product doctrine or any other claimed immunity from production, identify the date, author, recipients, title, general nature and privilege and / or immunity claimed.

If additional documents are discovered that fall within the terms of this request, the additional items shall be produced immediately.

DEFINITIONS

1.) "Documents," as used below, includes all material defined in Rule 34 of the Federal Rules of Civil Procedure, and are not limited to the specific examples listed, and further includes any written document of any nature whatsoever (*including but not limited to any emails or text messages*), any audio-tape, any video-tape, or any repository of any electronic data, such as computer hard drives or memory cards of portable communication devices.

2.) "Los Angeles Police Department," as used below, refers to the Los Angeles Police Department and any other associated or affiliated law enforcement entities, including but not limited to any Sheriff's Departments, Regional Offices, and County Offices, together with all current and former officers and employees thereof, and/or any outside persons or entities retained to act on their behalf.

DOCUMENTS TO BE PRODUCED

1.) From August 1, 2017 through December 31, 2017, any and all documents, including but not limited to any call logs, reports, notes, memoranda, or email messages, related to any actions taken by the Los Angeles Police Department, including but not limited to any investigations, on the basis of a report, telephone call or other communication received from an individual identifying themselves as Keegan Cox.

2.) From August 1, 2017 through December 31, 2017, any and all documents, including but not limited to any call logs, reports, memoranda, or email messages, related to any actions taken by the Los Angeles Police Department, including but not limited to any investigations, on the basis of a report, telephone call or other communication received from an individual identifying themselves as Cristian Murguia.

3.) From August 1, 2017 through December 31, 2017, any and all documents, including but not limited to any call logs, reports, memoranda, or email messages, related to any actions taken by the Los Angeles Police Department, including but not limited to any investigations, on the basis of a report, telephone call or other

communication received from an individual identifying themselves as Pieter Clayton or Pete Clayton.

4.) From August 1, 2017 through December 31, 2017, any and all documents, including but not limited to any call logs, reports, memoranda, or email messages, related to any actions taken by the Los Angeles Police Department, including but not limited to any investigations, on the basis of a report, telephone call or other communication received from an individual identifying themselves as Joseph Solis or Joe Solis.

Emp. Ex. 7

FORM NLRB-32

SUBPOENA

UNITED STATES OF AMERICA
NATIONAL LABOR RELATIONS BOARD

To Joe Solis, 1620 Coolidge Drive, Suite 130
Folsom, CA 95630

As requested by RadNet Management, Inc. d/b/a
San Fernando Valley Advanced Imaging Center

whose address is 14860 Roscoe Blvd, Suite 101, Panorama City, CA 91402
(Street) (City) (State) (ZIP)

YOU ARE HEREBY REQUIRED AND DIRECTED TO APPEAR BEFORE a Hearing Officer
of the National Labor Relations Board

at 11500 W. Olympic Blvd, Suite 1600

in the City of Los Angeles

on January 30, 2018 at 9:00 am or any adjourned

or rescheduled date to testify in RadNet Management, Inc. d/b/a San Fernando Valley Interventional Radiology and Imaging Center (31-RM-209388) and RadNet Management, Inc. d/b/a San Fernando Valley Advanced Imaging Center (31-RM-209424)
(Case Name and Number)

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A-1-ZPB66D

Under the seal of the National Labor Relations Board, and by direction of the Board, this Subpoena is

Issued at Los Angeles, CA

Dated: January 17, 2018

Marvin Kaplan, Chairman

NOTICE TO WITNESS. Witness fees for attendance, subsistence, and mileage under this subpoena are payable by the party at whose request the witness is subpoenaed. A witness appearing at the request of the General Counsel of the National Labor Relations Board shall submit this subpoena with the voucher when claiming reimbursement.

PRIVACY ACT STATEMENT

Solicitation of the information on this form is authorized by the National Labor Relations Act (NLRA), 29 U.S.C. § 151 *et seq.* The principal use of the information is to assist the National Labor Relations Board (NLRB) in processing representation and/or unfair labor practice proceedings and related proceedings or litigation. The routine uses for the information are fully set forth in the Federal Register, 71 Fed. Reg. 74942-43 (Dec. 13, 2006). The NLRB will further explain these uses upon request. Disclosure of this information to the NLRB is mandatory in that failure to supply the information may cause the NLRB to seek enforcement of the subpoena in federal court.

Case 31-RM-209388

A-1-ZPB66D

RETURN OF SERVICE

I certify that, being a person over 18 years of age, I duly served a copy of this subpoena

(Check method used.)

- ☐ by person
- ☐ by certified mail
- ☐ by registered mail
- ☐ by telegraph
- ☐ by leaving copy at principal office or place of business at

_____

_____

_____

on the named person on

_____

(Month, day, and year)

_____

(Name of person making service)

_____

(Official title, if any)

CERTIFICATION OF SERVICE

I certify that named person was in attendance as a witness at

_____

on

(Month, day or days, and year)

_____

(Name of person certifying)

_____

(Official title)

FORM NLRB-32

SUBPOENA

UNITED STATES OF AMERICA
NATIONAL LABOR RELATIONS BOARD

To Joe Solis, 620 Coolidge Drive, Suite 130
Folsom, CA 95630

As requested by Radnet Management, Inc. d/b/a
San Fernando Valley Interventional Radiology + Imaging Center

whose address is 16311 Ventura Blvd, Suite 120 Encino CA 91436
(Street) (City) (State) (ZIP)

YOU ARE HEREBY REQUIRED AND DIRECTED TO APPEAR BEFORE a Hearing Officer

of the National Labor Relations Board

at 11500 W. Olympic Blvd., Suite 600

in the City of Los Angeles

on January 30, 2018 at 9:00 am or any adjourned

or rescheduled date to testify in RadNet Management, Inc. d/b/a San Fernando Valley Interventional Radiology and Imaging Center (31-RM-209388) and RadNet Management, Inc. d/b/a San Fernando Valley Advanced Imaging Center (31-RM-209424)
(Case Name and Number)

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A-1-ZPB4MT

Under the seal of the National Labor Relations Board, and by direction of the Board, this Subpoena is

Issued at Los Angeles, CA

Dated: January 17, 2018

Marvin Kaplan, Chairman

NOTICE TO WITNESS. Witness fees for attendance, subsistence, and mileage under this subpoena are payable by the party at whose request the witness is subpoenaed. A witness appearing at the request of the General Counsel of the National Labor Relations Board shall submit this subpoena with the voucher when claiming reimbursement.

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Case 31-RM-209388

A-1-ZPB4MT

RETURN OF SERVICE

I certify that, being a person over 18 years of age, I duly served a copy of this subpoena

(Check method used.)

- ☐ by person
- ☐ by certified mail
- ☐ by registered mail
- ☐ by telegraph
- ☐ by leaving copy at principal office or place of business at

_____

_____

_____

on the named person on

_____

(Month, day, and year)

_____

(Name of person making service)

_____

(Official title, if any)

CERTIFICATION OF SERVICE

I certify that named person was in attendance as a witness at

_____

on

(Month, day or days, and year)

_____

(Name of person certifying)

_____

(Official title)

FORM NLRB-31

SUBPOENA DUCES TECUM

UNITED STATES OF AMERICA
NATIONAL LABOR RELATIONS BOARD

To Joe Solis, 620 Coolidge Drive, Suite 130
Folsom, CA 95630

As requested by RadNet Management, Inc. d/b/a San Fernando Valley Adv. Imaging Ctr.

whose address is 14860 Roscoe Blvd, Suite 101 Panorama City, CA 91402
(Street) (City) (State) (ZIP)

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(Case Name and Number)

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B-1-ZPBGDB

Under the seal of the National Labor Relations Board, and by direction of the Board, this Subpoena is

Issued at Los Angeles, CA

Dated: January 17, 2018

Marvin Kaplan, Chairman

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Case 31-RM-209388

B-1-ZPBGDB

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(Check method used.)

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_____

_____

on the named person on

_____

(Month, day, and year)

_____

(Name of person making service)

_____

(Official title, if any)

CERTIFICATION OF SERVICE

I certify that named person was in attendance as a witness at

_____

on

(Month, day or days, and year)

_____

(Name of person certifying)

_____

(Official title)

UNITED STATES OF AMERICA
NATIONAL LABOR RELATIONS BOARD
REGION 31

RADNET MANAGEMENT, INC. D/B/A SAN FERNANDO VALLEY ADVANCED IMAGING CENTER Petitioner *and* NATIONAL UNION OF HEALTHCARE WORKERS Labor Organization	Case No. 31-RM-209424

ATTACHMENT TO SUBPOENA *DUCES TECUM* NO. B-1-ZPBGDB

By service of Subpoena *Duces Tecum* No. B-1-ZPBGDB, RadNet Management, Inc. d/b/a San Fernando Valley Advanced Imaging Center (hereafter, "RadNet") hereby seeks production of all requested documents within your possession, custody or control without regard to who has physical possession of them or who prepared the documents, and wherever retained.

Documents produced should be grouped and in the order that they are maintained in the normal course, and should include all files and file labels in which the documents, and extra copies of them, are located.

For any document withheld on a claim of privilege and/or under the work-product doctrine or any other claimed immunity from production, identify the date, author, recipients, title, general nature and privilege and / or immunity claimed.

If additional documents are discovered that fall within the terms of this request, the additional items shall be produced immediately.

DEFINITIONS

1.) "Documents," as used below, includes all material defined in Rule 34 of the Federal Rules of Civil Procedure, and are not limited to the specific examples listed, and further includes any written document of any nature whatsoever (*including but not limited to any emails or text messages*), any audio-tape, any video-tape, or any repository of any electronic data, such as computer hard drives or memory cards of portable communication devices.

2.) "Employee(s)," as used below, refers to the employees working out of any one or more of the facilities referenced by the Petition filed by the National Union of Healthcare Workers in Case No. 31-RC-208646. A copy of the Petition is attached hereto as "Exhibit A."

3.) "IAMAW," as used below, refers to the International Association of Machinists and Aerospace Workers, and / or any affiliated entity, including but not limited to the National Union of Healthcare Workers, together with

all current and former officers and employees thereof and any outside persons or entities retained to act on their behalf.

4.) The "Union," as used below, refers to the National Union of Healthcare Workers, and / or any affiliated entity, including but not limited to the International Association of Machinists and Aerospace Workers, together with all current and former officers and employees thereof and any outside persons or entities retained to act on their behalf.

5.) "You," as used below, refers to Mr. Joe Solis.

DOCUMENTS TO BE PRODUCED

1.) Any and all documents, including but not limited to any e-mails or text messages, in which any Employee informed You, the IAMAW, or the Union that he or she, or some other Employee, is opposed to representation by the Union or prefers not to communicate with the Union about representation by the Union. RadNet requests that any responsive documents initially be produced only to the hearing officer for *in camera* review.

2.) For the period October 1, 2017 to the present, any and all documents, including but not limited to phone records, that show, refer, evidence or relate to any communication by You, the IAMAW, the Union or any Employee to the Los Angeles Police Department and / or any

communication from the Los Angeles Police Department to You, the IAMAW, the Union or any Employee.

4.) Any and all documents, including but not limited to any e-mails or text messages, sent by You, the IAMAW or the Union to any Employee in which reference is made to any police report that may be filed or has been filed against any Employee, and / or any manager assigned to any facility operated by RadNet Management, Inc., and / or any facility operated by RadNet Management, Inc. RadNet requests that any responsive documents initially be produced only to the hearing officer for *in camera* review.

5.) Any and all documents, including but not limited to any e-mails or text messages, sent by any Employee to You, the IAMAW or the Union in which the Employee makes any reference to any police report that may be filed or has been filed against any Employee, and / or any manager assigned to any facility operated by RadNet Management, Inc., and / or any facility operated by RadNet Management, Inc. RadNet requests that any responsive documents initially be produced only to the hearing officer for *in camera* review.

6.) Any and all documents, including but not limited to any e-mails or text messages, sent by You or the IAMAW to the Union in which reference is made to any police report that may be filed or has been filed against any

Employee, and / or any manager assigned to any facility operated by RadNet Management, Inc., and / or any facility operated by RadNet Management, Inc. RadNet requests that any responsive documents initially be produced only to the hearing officer for *in camera* review.

7.) Any and all documents, including but not limited to any e-mails or text messages, sent by the Union to You or the IAMAW in which the Union makes any reference to any police report that may be filed or has been filed against any Employee, and / or any manager assigned to any facility operated by RadNet Management, Inc., and / or any facility operated by RadNet Management, Inc. RadNet requests that any responsive documents initially be produced only to the hearing officer for *in camera* review.

EXHIBIT A

FORM NLRB-502 (RC)
4-15

UNITED STATES GOVERNMENT
NATIONAL LABOR RELATIONS BOARD

RC PETITION

DO NOT WRITE IN THIS SPACE	
Case No. 31-RC-208646	Date Filed 10/26/2017

***INSTRUCTIONS:** Unless e-Filed using the Agency's website, www.nlrb.gov, submit an original of this Petition to an NLRB office in the Region in which the employer concerned is located. The petition must be accompanied by both a showing of interest (see 6b below) and a certificate of service showing service on the employer and all other parties named in the petition of: (1) the petition; (2) Statement of Position form (Form NLRB-505); and (3) Description of Representation Case Procedures (Form NLRB 4812). The showing of Interest should only be filed with the NLRB and should not be served on the employer or any other party.*

1. **PURPOSE OF THIS PETITION: RC-CERTIFICATION OF REPRESENTATIVE** - A substantial number of employees wish to be represented for purposes of collective bargaining by Petitioner and Petitioner desires to be certified as representative of the employees. **The Petitioner alleges that the following circumstances exist and requests that the National Labor Relations Board proceed under its proper authority pursuant to Section 9 of the National Labor Relations Act.**

2a. Name of Employer	2b. Address(es) of Establishment(s) involved *(Street and number, city, State, ZIP code)*
RadNet Inc. and Radnet Management Inc., Joint Employers	see attachment

3a. Employer Representative – Name and Title	3b. Address (If same as 2b – state same)
Christopher Catalano	18133 Ventura Blvd, Suite 100, Tarzana, CA 91356

3c. Tel. No.	3d. Cell No.	3e. Fax No.	3f. E-Mail Address
(818) 933-2020 ext 1261	(805) 750-1013		chris.catalano@radnet.com

4a. Type of Establishment *(Factory, mine, wholesaler, etc.)*	4b. Principal product or service	5a. *City and State where unit is located*
Healthcare facility	Outpatient Imaging services	see attachment

5b. Description of Unit Involved

Included: All full-time, and regular part-time, per diem RN and Technical employees, employed by the employer at its facilities in the San Fernando Valley Region listed in 2b.

Excluded: All other employees, managers, confidential employees, guards, physicians, service, office clericals and supervisors as defined by the Act.

5c. No. of Employees in Unit: 115

6b. Do a substantial number (30% or more) of the employees in the unit wish to be represented by the Petitioner? Yes [✓] No [ ]

Check One: [✓] 7a. Request for recognition as Bargaining Representative was made on (Date) 10/11/2017 and Employer declined recognition on or about 10/11/2017 (Date) *(If no reply received, so state)*

[ ] 7b. Petitioner is currently recognized as Bargaining Representative and desires certification under the Act.

8a. Name of Recognized or Certified Bargaining Agent *(If none, so state)*.	8b. Address
none	

8c. Tel. No.	8d. Cell No.	8e. Fax No.	8f. E-Mail Address

8g. Affiliation, if any	8h. Date of Recognition or Certification	8i. Expiration Date of Current or Most Recent Contract, If any *(Month, Day, Year)*

9. Is there now a strike or picketing at the Employer's establishment(s) involved? no If so, approximately how many employees are participating? _____

(Name of labor organization) _____, has picketed the Employer since *(Month, Day, Year)* _____

10. Organizations or individuals other than Petitioner and those named in items 8 and 9, which have claimed recognition as representatives and other organizations and individuals known to have a representative interest in any employees in the unit described in item 5b above. *(If none, so state)*

none

10a. Name	10b. Address	10c. Tel. No.	10d. Cell No.
		10e. Fax No.	10f. E-Mail Address

11. **Election Details:** If the NLRB conducts an election in this matter, state your position with respect to any such election:

11a. Election Type: [ ] Manual [✓] Mail [ ] Mixed Manual/Mail

11b. Election Date(s)	11c. Election Time(s)	11d. Election Location(s)
~~11/28/2017~~ 11/7/17-11/21/17		

12a. Full Name of Petitioner *(including local name and number)*	12b. Address *(street and number, city, state, and ZIP code)*
National Union of Healthcare Workers	5801 Christie Ave. Suite 525, Emeryville, CA 94608

12c. Full name of national or international labor organization of which Petitioner is an affiliate or constituent *(if none, so state)*

none

12d. Tel. No.	12e. Cell No.	12f. Fax No.	12g. E-Mail Address
(510) 834-2017			

13. **Representative of the Petitioner who will accept service of all papers for purposes of the representation proceeding.**

13a. Name and Title	13b. Address *(street and number, city, state, and ZIP code)*
Sophia Mendoza, Organizer	325 W. Broadway, Suite 155, Glendale, CA 91204

13c. Tel. No.	13d. Cell No.	13e. Fax No.	13f. E-Mail Address
	(213) 280-0051	(818) 241-0141	smendoza@nuhw.org

I declare that I have read the above petition and that the statements are true to the best of my knowledge and belief.

Name *(Print)*	Signature	Title	Date
Florice Hoffman	Florice Hoffman	Attorney	~~[illegible]~~ 10/24/17

WILLFUL FALSE STATEMENTS ON THIS PETITION CAN BE PUNISHED BY FINE AND IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001)

PRIVACY ACT STATEMENT

Solicitation of the information on this form is authorized by the National Labor Relations Act (NLRA), 29 U.S.C. § 151 *et seq.* The principal use of the information is to assist the National Labor Relations Board (NLRB) in processing representation and related proceedings or litigation. The routine uses for the information are fully set forth in the Federal Register, 71 Fed. Reg. 74942-43 (Dec. 13, 2006). The NLRB will further explain these uses upon request. Disclosure of this information to the NLRB is voluntary; however, failure to supply the information will cause the NLRB to decline to invoke its processes.

Radnet SFV RC petition Attachments:

Center	Address	City
Burbank Imaging X-Ray	3808 Riverside Dr., Ste. 120	Burbank, CA 91505
Burbank Breast Care Center	2601 W. Alameda Ave., Ste. 101	Burbank, CA 91505
Imaging Specialists of Burbank	1821 W. Olive Ave.	Burbank, CA 91506
Liberty Pacific Advanced Imaging Encino	16130 Ventura Blvd.	Encino, CA 91436
San Fernando Valley Interventional Radiology and Imaging Center	16311 Ventura Boulevard, Ste. 120	Encino, CA 91436
Imaging Specialists of Glendale	700 N. Central Avenue, Suite 100	Glendale, CA 91203
Marcia Ray Breastlink Women's Imaging Center	222 W. Eulalia Street	Glendale, CA 91204
San Fernando Valley Advanced Imaging Center	14860 Roscoe Blvd., Ste. 101	Panorama City, CA 91402
Imaging Specialists of Pasadena	630 S. Raymond Ave. Suite 210	Pasadena, CA 91105
Northridge Diagnostic Center – Walk-In X-Ray	8327 Reseda Blvd.	Reseda, CA 91325
Northridge Diagnostic Center	8227 Reseda Blvd.	Reseda, CA 91335
Liberty Pacific Advanced Imaging Tarzana and Breastlink Women's Imaging	18133 Ventura Blvd., Suite 100 and 200	Tarzana, CA 91356
Burbank Advanced Imaging Center	10101 Riverside Dr.	Toluca Lake, CA 91062
Santa Clarita Imaging	25775 W. McBean Pkwy, Ste. 100 and 216	Valencia, CA 91355
Vanowen Advanced Imaging	15243 Vanowen Street, Ste. 106	Van Nuys, CA 91405
Valley Hills Imaging	23101 Sherman Place, Suite 210	West Hills, CA 91307

5a.
Burbank, CA
Encino, CA
Glendale, CA
Panorama City, CA
Pasadena, CA
Reseda, CA
Tarzana, CA
Toluca Lake, CA
Valencia, CA
Van Nuys, CA
West Hills, CA

FORM NLRB-31

SUBPOENA DUCES TECUM

UNITED STATES OF AMERICA
NATIONAL LABOR RELATIONS BOARD

To Joe Sous, 620 Coolidge Drive, Suite 130
Folsom, CA 95630

As requested by RadNet Management, Inc. d/b/a San Fernando Valley Intervent. Rad. + Imaging Center

whose address is 14311 Ventura Blvd, Suite 120, Encino CA 91436
(Street) (City) (State) (ZIP)

YOU ARE HEREBY REQUIRED AND DIRECTED TO APPEAR BEFORE a Hearing Officer

of the National Labor Relations Board

at 11500 W. Olympic Blvd, Suite 600

in the City of Los Angeles

on January 30, 2018 at 9:00 am or any adjourned

or rescheduled date to testify in RadNet Management, Inc. d/b/a San Fernando Valley Interventional Radiology and Imaging Center and RadNet Management, Inc. d/b/a San Fernando Valley Advanced Imaging Center
Cases 31-RM-209388 and 31-RM-209424
(Case Name and Number)

And you are hereby required to bring with you and produce at said time and place the following books, records, correspondence, and documents:

SEE ATTACHMENT

If you do not intend to comply with the subpoena, within 5 days (excluding intermediate Saturdays, Sundays, and holidays) after the date the subpoena is received, you must petition in writing to revoke the subpoena. Unless filed through the Board's E-Filing system, the petition to revoke must be received on or before the official closing time of the receiving office on the last day for filing. If filed through the Board's E-Filing system, it may be filed up to 11:59 pm in the local time zone of the receiving office on the last day for filing. Prior to a hearing, the petition to revoke should be filed with the Regional Director; during a hearing, it should be filed with the Hearing Officer or Administrative Law Judge conducting the hearing. See Board's Rules and Regulations, 29 C.F.R Section 102.31(b) (unfair labor practice proceedings) and/or 29 C.F.R. Section 102.66(c) (representation proceedings) and 29 C.F.R Section 102.111(a)(1) and 102.111(b)(3) (time computation). Failure to follow these rules may result in the loss of any ability to raise objections to the subpoena in court.

B-1-ZUMFNL

Under the seal of the National Labor Relations Board, and by direction of the Board, this Subpoena is

Issued at

Dated:

Marvin Kaplan, Chairman

NOTICE TO WITNESS. Witness fees for attendance, subsistence, and mileage under this subpoena are payable by the party at whose request the witness is subpoenaed. A witness appearing at the request of the General Counsel of the National Labor Relations Board shall submit this subpoena with the voucher when claiming reimbursement.

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Case 31-RM-209388

B-1-ZUMFNL

RETURN OF SERVICE

I certify that, being a person over 18 years of age, I duly served a copy of this subpoena

(Check method used.)

- ☐ by person
- ☐ by certified mail
- ☐ by registered mail
- ☐ by telegraph
- ☐ by leaving copy at principal office or place of business at

_____

_____

_____

on the named person on

_____

(Month, day, and year)

_____

(Name of person making service)

_____

(Official title, if any)

CERTIFICATION OF SERVICE

I certify that named person was in attendance as a witness at

_____

on

(Month, day or days, and year)

_____

(Name of person certifying)

_____

(Official title)

UNITED STATES OF AMERICA
NATIONAL LABOR RELATIONS BOARD
REGION 31

RADNET MANAGEMENT, INC. D/B/A SAN FERNANDO VALLEY INTERVENTIONAL RADIOLOGY AND IMAGING CENTER Petitioner *and* NATIONAL UNION OF HEALTHCARE WORKERS Labor Organization	Case No. 31-RM-209388

ATTACHMENT TO SUBPOENA *DUCES TECUM* NO. B-1-ZUMFNL

By service of Subpoena *Duces Tecum* No. B-1-ZUMFNL, RadNet Management, Inc. d/b/a San Fernando Valley Interventional Radiology and Imaging Center (hereafter, "RadNet") hereby seeks production of all requested documents within your possession, custody or control without regard to who has physical possession of them or who prepared the documents, and wherever retained.

Documents produced should be grouped and in the order that they are maintained in the normal course, and should include all files and file labels in which the documents, and extra copies of them, are located.

For any document withheld on a claim of privilege and/or under the work-product doctrine or any other claimed immunity from production, identify the date, author, recipients, title, general nature and privilege and / or immunity claimed.

If additional documents are discovered that fall within the terms of this request, the additional items shall be produced immediately.

DEFINITIONS

1.) "Documents," as used below, includes all material defined in Rule 34 of the Federal Rules of Civil Procedure, and are not limited to the specific examples listed, and further includes any written document of any nature whatsoever (*including but not limited to any emails or text messages*), any audio-tape, any video-tape, or any repository of any electronic data, such as computer hard drives or memory cards of portable communication devices.

2.) "Employee(s)," as used below, refers to the employees working out of any one or more of the facilities referenced by the Petition filed by the National Union of Healthcare Workers in Case No. 31-RC-208646. A copy of the Petition is attached hereto as "Exhibit A."

3.) "IAMAW," as used below, refers to the International Association of Machinists and Aerospace Workers, and / or any affiliated entity, including but not limited to the National Union of Healthcare Workers, together with

all current and former officers and employees thereof and any outside persons or entities retained to act on their behalf.

4.) The "Union," as used below, refers to the National Union of Healthcare Workers, and / or any affiliated entity, including but not limited to the International Association of Machinists and Aerospace Workers, together with all current and former officers and employees thereof and any outside persons or entities retained to act on their behalf.

5.) "You," as used below, refers to Mr. Joe Solis.

DOCUMENTS TO BE PRODUCED

1.) Any and all documents, including but not limited to any e-mails or text messages, in which any Employee informed You, the IAMAW, or the Union that he or she, or some other Employee, is opposed to representation by the Union or prefers not to communicate with the Union about representation by the Union. RadNet requests that any responsive documents initially be produced only to the hearing officer for *in camera* review.

2.) For the period October 1, 2017 to the present, any and all documents, including but not limited to phone records, that show, refer, evidence or relate to any communication by You, the IAMAW, the Union or any Employee to the Los Angeles Police Department and / or any

communication from the Los Angeles Police Department to You, the IAMAW, the Union or any Employee.

4.) Any and all documents, including but not limited to any e-mails or text messages, sent by You, the IAMAW or the Union to any Employee in which reference is made to any police report that may be filed or has been filed against any Employee, and / or any manager assigned to any facility operated by RadNet Management, Inc., and / or any facility operated by RadNet Management, Inc. RadNet requests that any responsive documents initially be produced only to the hearing officer for *in camera* review.

5.) Any and all documents, including but not limited to any e-mails or text messages, sent by any Employee to You, the IAMAW or the Union in which the Employee makes any reference to any police report that may be filed or has been filed against any Employee, and / or any manager assigned to any facility operated by RadNet Management, Inc., and / or any facility operated by RadNet Management, Inc. RadNet requests that any responsive documents initially be produced only to the hearing officer for *in camera* review.

6.) Any and all documents, including but not limited to any e-mails or text messages, sent by You or the IAMAW to the Union in which reference is made to any police report that may be filed or has been filed against any

Employee, and / or any manager assigned to any facility operated by RadNet Management, Inc., and / or any facility operated by RadNet Management, Inc. RadNet requests that any responsive documents initially be produced only to the hearing officer for *in camera* review.

7.) Any and all documents, including but not limited to any e-mails or text messages, sent by the Union to You or the IAMAW in which the Union makes any reference to any police report that may be filed or has been filed against any Employee, and / or any manager assigned to any facility operated by RadNet Management, Inc., and / or any facility operated by RadNet Management, Inc. RadNet requests that any responsive documents initially be produced only to the hearing officer for *in camera* review.

EXHIBIT A

FORM NLRB-502 (RC)
(4-15)

UNITED STATES GOVERNMENT
NATIONAL LABOR RELATIONS BOARD

RC PETITION

DO NOT WRITE IN THIS SPACE

Case No.	Date Filed
31-RC-208646	10/26/2017

INSTRUCTIONS: Unless e-Filed using the Agency's website, www.nlrb.gov, submit an original of this Petition to an NLRB office in the Region in which the employer concerned is located. The petition must be accompanied by both a showing of interest (see 6b below) and a certificate of service showing service on the employer and all other parties named in the petition of: (1) the petition; (2) Statement of Position form (Form NLRB-505); and (3) Description of Representation Case Procedures (Form NLRB 4812). The showing of Interest should only be filed with the NLRB and should not be served on the employer or any other party.

1. PURPOSE OF THIS PETITION: RC-CERTIFICATION OF REPRESENTATIVE - A substantial number of employees wish to be represented for purposes of collective bargaining by Petitioner and Petitioner desires to be certified as representative of the employees. The Petitioner alleges that the following circumstances exist and requests that the National Labor Relations Board proceed under its proper authority pursuant to Section 9 of the National Labor Relations Act.

2a. Name of Employer: RadNet Inc. and Radnet Management Inc. Joint Employers

2b. Address(es) of Establishment(s) involved (Street and number, city, State, ZIP code): see attachment

3a. Employer Representative – Name and Title: Christopher Catalano

3b. Address (If same as 2b – state same): 18133 Ventura Blvd, Suite 100, Tarzana, CA 91356

3c. Tel. No.: (818) 933-2020 ext 1261

3d. Cell No.: (805) 750-1013

3e. Fax No.:

3f. E-Mail Address: chris.catalano@radnet.com

4a. Type of Establishment (Factory, mine, wholesaler, etc.): Healthcare facility

4b. Principal product or service: Outpatient imaging services

5a. City and State where unit is located: see attachment

5b. Description of Unit Involved
Included: All full-time, and regular part-time, per diem RN and Technical employees, employed by the employer at its facilities in the San Fernando Valley Region listed in 2b.
Excluded: All other employees, managers, confidential employees, guards, physicians, service, office clericals and supervisors as defined by the Act.

6a. No. of Employees in Unit: 115

6b. Do a substantial number (30% or more) of the employees in the unit wish to be represented by the Petitioner? Yes [✓] No [ ]

Check One:
[✓] 7a. Request for recognition as Bargaining Representative was made on (Date) 10/11/2017 and Employer declined recognition on or about 10/11/2017 (Date) (If no reply received, so state)
[ ] 7b. Petitioner is currently recognized as Bargaining Representative and desires certification under the Act.

8a. Name of Recognized or Certified Bargaining Agent (If none, so state): none

8b. Address:

8c. Tel No.:

8d. Cell No.:

8e. Fax No.:

8f. E-Mail Address:

8g. Affiliation, if any:

8h. Date of Recognition or Certification:

8i. Expiration Date of Current or Most Recent Contract, If any (Month, Day, Year):

9. Is there now a strike or picketing at the Employer's establishment(s) involved? no if so, approximately how many employees are participating? _____
(Name of labor organization) _____ has picketed the Employer since (Month, Day, Year) _____

10. Organizations or individuals other than Petitioner and those named in items 8 and 9, which have claimed recognition as representatives and other organizations and individuals known to have a representative interest in any employees in the unit described in item 5b above. (If none, so state)
none

10a. Name:

10b. Address:

10c. Tel. No.:

10d. Cell No.:

10e. Fax No.:

10f. E-Mail Address:

11. Election Details: If the NLRB conducts an election in this matter, state your position with respect to any such election:

11a. Election Type: [ ] Manual [✓] Mail [ ] Mixed Manual/Mail

11b. Election Date(s): 11/7/17-11/21/17

11c. Election Time(s):

11d. Election Location(s):

12a. Full Name of Petitioner (including local name and number): National Union of Healthcare Workers

12b. Address (street and number, city, state, and ZIP code): 5801 Christie Ave. Suite 525, Emeryville, CA 94608

12c. Full name of national or international labor organization of which Petitioner is an affiliate or constituent (If none, so state): none

12d. Tel No.: (510) 834-2017

12e. Cell No.:

12f. Fax No.:

12g. E-Mail Address:

13. Representative of the Petitioner who will accept service of all papers for purposes of the representation proceeding.

13a. Name and Title: Sophia Mendoza, Organizer

13b. Address (street and number, city, state, and ZIP code): 225 W. Broadway, Suite 1bb, Glendale, CA 91204

13c. Tel No.:

13d. Cell No.: (213) 280-0051

13e. Fax No.: (818) 241-0141

13f. E-Mail Address: smendoza@nuhw.org

I declare that I have read the above petition and that the statements are true to the best of my knowledge and belief.

Name (Print)	Signature	Title	Date
Flonde Hoffman	Flonde Hoffman	Attorney	10/24/17

WILLFUL FALSE STATEMENTS ON THIS PETITION CAN BE PUNISHED BY FINE AND IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001)

PRIVACY ACT STATEMENT

Solicitation of the information on this form is authorized by the National Labor Relations Act (NLRA), 29 U.S.C. § 151 et seq. The principal use of the information is to assist the National Labor Relations Board (NLRB) in processing representation and related proceedings or litigation. The routine uses for the information are fully set forth in the Federal Register, 71 Fed. Reg. 74942-43 (Dec. 13, 2006). The NLRB will further explain these uses upon request. Disclosure of this information to the NLRB is voluntary; however, failure to supply the information will cause the NLRB to decline to invoke its processes.

Radnet SFV RC petition Attachments:

Center	Address	City
Burbank Imaging X-Ray	3808 Riverside Dr., Ste. 120	Burbank, CA 91505
Burbank Breast Care Center	2601 W. Alameda Ave., Ste. 101	Burbank, CA 91505
Imaging Specialists of Burbank	1821 W. Olive Ave.	Burbank, CA 91506
Liberty Pacific Advanced Imaging Encino	16130 Ventura Blvd.	Encino, CA 91436
San Fernando Valley Interventional Radiology and Imaging Center	16311 Ventura Boulevard, Ste. 120	Encino, CA 91436
Imaging Specialists of Glendale	700 N. Central Avenue, Suite 100	Glendale, CA 91203
Marcia Ray Breastlink Women's Imaging Center	222 W. Eulalia Street	Glendale, CA 91204
San Fernando Valley Advanced Imaging Center	14860 Roscoe Blvd., Ste. 101	Panorama City, CA 91402
Imaging Specialists of Pasadena	630 S. Raymond Ave. Suite 210	Pasadena, CA 91105
Northridge Diagnostic Center – Walk-In X-Ray	8327 Reseda Blvd.	Reseda, CA 91325
Northridge Diagnostic Center	8227 Reseda Blvd.	Reseda, CA 91335
Liberty Pacific Advanced Imaging Tarzana and Breastlink Women's Imaging	18133 Ventura Blvd., Suite 100 and 200	Tarzana, CA 91356
Burbank Advanced Imaging Center	10101 Riverside Dr.	Toluca Lake, CA 91062
Santa Clarita Imaging	25775 W. McBean Pkwy, Ste. 100 and 216	Valencia, CA 91355
Vanowen Advanced Imaging	15243 Vanowen Street, Ste. 106	Van Nuys, CA 91405
Valley Hills Imaging	23101 Sherman Place, Suite 210	West Hills, CA 91307

5a.
Burbank, CA
Encino, CA
Glendale, CA
Panorama City, CA
Pasadena, CA
Reseda, CA
Tarzana, CA
Toluca Lake, CA
Valencia, CA
Van Nuys, CA
West Hills, CA

Emp Ex 8

FORM NLRB-32

SUBPOENA

UNITED STATES OF AMERICA
NATIONAL LABOR RELATIONS BOARD

To Pieter Clayton, 225 West Broadway, Suite 155
Glendale, CA 91204

As requested by RadNet Management, Inc. d/b/a
San Fernando Valley Advanced Imaging Center

whose address is 14860 Roscoe Blvd, Suite 101 Panorama City, CA 91402
(Street) (City) (State) (ZIP)

YOU ARE HEREBY REQUIRED AND DIRECTED TO APPEAR BEFORE a Hearing Officer

of the National Labor Relations Board

at 11500 W. Olympic Blvd, Suite 600

in the City of Los Angeles

on January 30, 2018 at 9:00 am or any adjourned

or rescheduled date to testify in RadNet Management, Inc. d/b/a San Fernando Valley Interventional Radiology and Imaging Center (31-RM-209388) and RadNet Management, Inc. d/b/a San Fernando Valley Advanced Imaging Center (31-RM-209424)
(Case Name and Number)

If you do not intend to comply with the subpoena, within 5 days (excluding intermediate Saturdays, Sundays, and holidays) after the date the subpoena is received, you must petition in writing to revoke the subpoena. Unless filed through the Board's E-Filing system, the petition to revoke must be received on or before the official closing time of the receiving office on the last day for filing. If filed through the Board's E-Filing system, it may be filed up to 11:59 pm in the local time zone of the receiving office on the last day for filing. Prior to a hearing, the petition to revoke should be filed with the Regional Director; during a hearing, it should be filed with the Hearing Officer or Administrative Law Judge conducting the hearing. See Board's Rules and Regulations, 29 C.F.R Section 102.31(b) (unfair labor practice proceedings) and/or 29 C.F.R. Section 102.66(c) (representation proceedings) and 29 C.F.R Section 102.111(a)(1) and 102.111(b)(3) (time computation). Failure to follow these rules may result in the loss of any ability to raise objections to the subpoena in court.

A-1-ZPB2WB

Under the seal of the National Labor Relations Board, and by direction of the Board, this Subpoena is

Issued at Los Angeles, CA

Dated: January 17, 2018

Marvin Kaplan, Chairman

NOTICE TO WITNESS. Witness fees for attendance, subsistence, and mileage under this subpoena are payable by the party at whose request the witness is subpoenaed. A witness appearing at the request of the General Counsel of the National Labor Relations Board shall submit this subpoena with the voucher when claiming reimbursement.

PRIVACY ACT STATEMENT

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Case 31-RM-209388

A-1-ZPB2WB

RETURN OF SERVICE

I certify that, being a person over 18 years of age, I duly served a copy of this subpoena

(Check method used.)

- ☐ by person
- ☐ by certified mail
- ☐ by registered mail
- ☐ by telegraph
- ☐ by leaving copy at principal office or place of business at

_____

_____

_____

on the named person on

_____

(Month, day, and year)

_____

(Name of person making service)

_____

(Official title, if any)

CERTIFICATION OF SERVICE

I certify that named person was in attendance as a witness at

_____

on

(Month, day or days, and year)

_____

(Name of person certifying)

_____

(Official title)

FORM NLRB-32

SUBPOENA

UNITED STATES OF AMERICA
NATIONAL LABOR RELATIONS BOARD

To Pieter Clayton, 225 West Broadway, Suite 155
Glendale, CA 91204

As requested by Radnet Management, Inc. d/b/a
San Fernando Valley Interventional Radiology + Imaging Center

whose address is 14311 Ventura Blvd, Suite 120, Encino CA 91436
(Street) (City) (State) (ZIP)

YOU ARE HEREBY REQUIRED AND DIRECTED TO APPEAR BEFORE a Hearing Officer
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in the City of Los Angeles

on January 30, 2018 at 9:00 am or any adjourned

or rescheduled date to testify in RadNet Management, Inc. d/b/a San Fernando Valley Interventional Radiology and Imaging Center and RadNet Management, Inc. d/b/a San Fernando Valley Advanced Imaging Center
Cases 31-RM-209388 and 31-RM-209424
(Case Name and Number)

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A-1-ZUMBSF

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Issued at

Dated:

Marvin Kaplan, Chairman

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Case 31-RM-209388

A-1-ZUMBSF

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(Check method used.)

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- ☐ by registered mail
- ☐ by telegraph
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_____

on the named person on

_____

(Month, day, and year)

_____

(Name of person making service)

_____

(Official title, if any)

CERTIFICATION OF SERVICE

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on

(Month, day or days, and year)

_____

(Name of person certifying)

_____

(Official title)

FORM NLRB-31

SUBPOENA DUCES TECUM

UNITED STATES OF AMERICA
NATIONAL LABOR RELATIONS BOARD

To Pieter Clayton, 225 W. Broadway, Suite 155
Glendale, CA 91204

As requested by RadNet Management, Inc. d/b/a San Fernando Valley Advanced Imaging Center

whose address is 14860 Roscoe Blvd, Suite 101, Panorama City, CA 91402
(Street) (City) (State) (ZIP)

YOU ARE HEREBY REQUIRED AND DIRECTED TO APPEAR BEFORE a Hearing Officer

of the National Labor Relations Board

at 11500 W. Olympic Blvd, Suite 1600

in the City of Los Angeles

on January 30, 2018 at 9:00 am or any adjourned

or rescheduled date to testify in RadNet Management, Inc. d/b/a San Fernando Valley Interventional Radiology and Imaging Center (31-RM-209388) and RadNet Management, Inc. d/b/a San Fernando Valley Advanced Imaging Center (31-RM-209424)
(Case Name and Number)

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B-1-ZPBN1B

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Issued at Los Angeles, CA

Dated: January 17, 2018

Marvin Kaplan, Chairman

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Case 31-RM-209388

B-1-ZPBN1B

RETURN OF SERVICE

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(Check method used.)

- ☐ by person
- ☐ by certified mail
- ☐ by registered mail
- ☐ by telegraph
- ☐ by leaving copy at principal office or place of business at

_____

_____

_____

on the named person on

_____

(Month, day, and year)

_____

(Name of person making service)

_____

(Official title, if any)

CERTIFICATION OF SERVICE

I certify that named person was in attendance as a witness at

_____

on

(Month, day or days, and year)

_____

(Name of person certifying)

_____

(Official title)

UNITED STATES OF AMERICA
NATIONAL LABOR RELATIONS BOARD
REGION 31

RADNET MANAGEMENT, INC. D/B/A SAN FERNANDO VALLEY ADVANCED IMAGING CENTER Petitioner *and* NATIONAL UNION OF HEALTHCARE WORKERS Labor Organization	Case No. 31-RM-209424

ATTACHMENT TO SUBPOENA *DUCES TECUM* NO. B-1-ZPBN1B

By service of Subpoena *Duces Tecum* No. B-1-ZPBN1B, RadNet Management, Inc. d/b/a San Fernando Valley Advanced Imaging Center (hereafter, "RadNet") hereby seeks production of all requested documents within your possession, custody or control without regard to who has physical possession of them or who prepared the documents, and wherever retained.

Documents produced should be grouped and in the order that they are maintained in the normal course, and should include all files and file labels in which the documents, and extra copies of them, are located.

For any document withheld on a claim of privilege and/or under the work-product doctrine or any other claimed immunity from production, identify the date, author, recipients, title, general nature and privilege and / or immunity claimed.

If additional documents are discovered that fall within the terms of this request, the additional items shall be produced immediately.

DEFINITIONS

1.) "Documents," as used below, includes all material defined in Rule 34 of the Federal Rules of Civil Procedure, and are not limited to the specific examples listed, and further includes any written document of any nature whatsoever (*including but not limited to any emails or text messages*), any audio-tape, any video-tape, or any repository of any electronic data, such as computer hard drives or memory cards of portable communication devices.

2.) "Employee(s)," as used below, refers to the employees working out of any one or more of the facilities referenced by the Petition filed by the National Union of Healthcare Workers in Case No. 31-RC-208646. A copy of the Petition is attached hereto as "Exhibit A."

3.) "IAMAW," as used below, refers to the International Association of Machinists and Aerospace Workers, and / or any affiliated entity, including but not limited to the National Union of Healthcare Workers, together with

all current and former officers and employees thereof and any outside persons or entities retained to act on their behalf.

4.) The "Union," as used below, refers to the National Union of Healthcare Workers, and / or any affiliated entity, including but not limited to the International Association of Machinists and Aerospace Workers, together with all current and former officers and employees thereof and any outside persons or entities retained to act on their behalf.

5.) "You," as used below, refers to Mr. Pieter Clayton.

DOCUMENTS TO BE PRODUCED

1.) Any and all documents, including but not limited to any e-mails or text messages, in which any Employee informed You or the Union that he or she, or some other Employee, is opposed to representation by the Union or prefers not to communicate with the Union about representation by the Union. RadNet requests that any responsive documents initially be produced only to the hearing officer for *in camera* review.

2.) For the period October 1, 2017 to the present, any and all documents, including but not limited to phone records, that show, refer, evidence or relate to any communication by You, the Union or any Employee to the Los Angeles Police Department and / or any communication from the Los Angeles Police Department to the Union or any Employee.

4.) Any and all documents, including but not limited to any e-mails or text messages, sent by You or the Union to any Employee in which reference is made to any police report that may be filed or has been filed against any Employee, and / or any manager assigned to any facility operated by RadNet Management, Inc., and / or any facility operated by RadNet Management, Inc. RadNet requests that any responsive documents initially be produced only to the hearing officer for *in camera* review.

5.) Any and all documents, including but not limited to any e-mails or text messages, sent by any Employee to You or the Union in which the Employee makes any reference to any police report that may be filed or has been filed against any Employee, and / or any manager assigned to any facility operated by RadNet Management, Inc., and / or any facility operated by RadNet Management, Inc. RadNet requests that any responsive documents initially be produced only to the hearing officer for *in camera* review.

6.) Any and all documents, including but not limited to any e-mails or text messages, sent by You or the Union to the IAMAW in which reference is made to any police report that may be filed or has been filed against any Employee, and / or any manager assigned to any facility operated by RadNet Management, Inc., and / or any facility operated by RadNet Management,

Inc. RadNet requests that any responsive documents initially be produced only to the hearing officer for *in camera* review.

7.) Any and all documents, including but not limited to any e-mails or text messages, sent by the IAMAW to You or the Union in which the IAMAW makes any reference to any police report that may be filed or has been filed against any Employee, and / or any manager assigned to any facility operated by RadNet Management, Inc., and / or any facility operated by RadNet Management, Inc. RadNet requests that any responsive documents initially be produced only to the hearing officer for *in camera* review.

EXHIBIT A

FORM NLRB-502 (RC)
(4-15)

UNITED STATES GOVERNMENT
NATIONAL LABOR RELATIONS BOARD

RC PETITION

DO NOT WRITE IN THIS SPACE

Case No.	Date Filed
31-RC-208646	10/26/2017

***INSTRUCTIONS:** Unless e-Filed using the Agency's website, www.nlrb.gov, submit an original of this Petition to an NLRB office in the Region in which the employer concerned is located. The petition must be accompanied by both a showing of interest (see 6b below) and a certificate of service showing service on the employer and all other parties named in the petition of: (1) the petition; (2) Statement of Position form (Form NLRB-505); and (3) Description of Representation Case Procedures (Form NLRB 4812). The showing of interest should only be filed with the NLRB and should not be served on the employer or any other party.*

1. **PURPOSE OF THIS PETITION: RC-CERTIFICATION OF REPRESENTATIVE** - A substantial number of employees wish to be represented for purposes of collective bargaining by Petitioner and Petitioner desires to be certified as representative of the employees. **The Petitioner alleges that the following circumstances exist and requests that the National Labor Relations Board proceed under its proper authority pursuant to Section 9 of the National Labor Relations Act.**

2a. Name of Employer	2b. Address(es) of Establishment(s) involved (Street and number, city, State, ZIP code)
RadNet Inc. and Radnet Management Inc. Joint Employers	see attachment

3a. Employer Representative – Name and Title	3b. Address (if same as 2b – state same)
Christopher Catalano	18133 Ventura Blvd, Suite 100, Tarzana, CA 91356

3c. Tel. No.	3d. Cell No.	3e. Fax No.	3f. E-Mail Address
(818) 933-2020 ext 1261	(805) 750-1013		chris.catalano@radnet.com

4a. Type of Establishment (Factory, mine, wholesaler, etc.)	4b. Principal product or service	5a. City and State where unit is located
Healthcare facility	Outpatient imaging services	see attachment

6b. Description of Unit involved

Included: All full-time, and regular part-time, per diem RN and Technical employees, employed by the employer at its facilities in the San Fernando Valley Region listed in 2b.

Excluded: All other employees, managers, confidential employees, guards, physicians, service, office clericals and supervisors as defined by the Act.

6a. No. of Employees in Unit: 115

6b. Do a substantial number (30% or more) of the employees in the unit wish to be represented by the Petitioner? Yes [✓] No [ ]

Check One: [✓] 7a. Request for recognition as Bargaining Representative was made on (Date) 10/11/2017 and Employer declined recognition on or about 10/11/2017 (Date) (If no reply received, so state)

[ ] 7b. Petitioner is currently recognized as Bargaining Representative and desires certification under the Act.

8a. Name of Recognized or Certified Bargaining Agent (If none, so state).	8b. Address
none	

8c. Tel. No.	8d. Cell No.	8e. Fax No.	8f. E-Mail Address

8g. Affiliation, if any	8h. Date of Recognition or Certification	8i. Expiration Date of Current or Most Recent Contract, If any (Month, Day, Year)

9. Is there now a strike or picketing at the Employer's establishment(s) involved? no. If so, approximately how many employees are participating? _____

(Name of labor organization) _____, has picketed the Employer since (Month, Day, Year) _____

10. Organizations or individuals other than Petitioner and those named in items 8 and 9, which have claimed recognition as representatives and other organizations and individuals known to have a representative interest in any employees in the unit described in item 5b above. (If none, so state)

none

10a. Name	10b. Address	10c. Tel. No.	10d. Cell No.
		10e. Fax No.	10f. E-Mail Address

11. **Election Details:** If the NLRB conducts an election in this matter, state your position with respect to any such election:

11a. Election Type: [ ] Manual [✓] Mail [ ] Mixed Manual/Mail

11b. Election Date(s)	11c. Election Time(s)	11d. Election Location(s)
~~[illegible]~~ 11/7/17-11/21/17		

12a. Full Name of Petitioner (including local name and number)	12b. Address (street and number, city, state, and ZIP code)
National Union of Healthcare Workers	5801 Christie Ave. Suite 525, Emeryville, CA 94608

12c. Full name of national or international labor organization of which Petitioner is an affiliate or constituent (If none, so state)

none

12d. Tel. No.	12e. Cell No.	12f. Fax No.	12g. E-Mail Address
(510) 834-2017			

13. **Representative of the Petitioner who will accept service of all papers for purposes of the representation proceeding.**

13a. Name and Title	13b. Address (street and number, city, state, and ZIP code)
Sophia Mendoza, Organizer	225 W. Broadway, Suite 155, Glendale, CA 91204

13c. Tel. No.	13d. Cell No.	13e. Fax No.	13f. E-Mail Address
	(213) 280-0051	(818) 241-0141	smendoza@nuhw.org

I declare that I have read the above petition and that the statements are true to the best of my knowledge and belief.

Name (Print)	Signature	Title	Date
Florice Hoffman	Flora Hoffman	Attorney	~~[illegible]~~ 10/24/17

WILLFUL FALSE STATEMENTS ON THIS PETITION CAN BE PUNISHED BY FINE AND IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001)

PRIVACY ACT STATEMENT

Solicitation of the information on this form is authorized by the National Labor Relations Act (NLRA), 29 U.S.C. § 151 *et seq.* The principal use of the information is to assist the National Labor Relations Board (NLRB) in processing representation and related proceedings or litigation. The routine uses for the information are fully set forth in the Federal Register, 71 Fed. Reg. 74942-43 (Dec. 13, 2006). The NLRB will further explain these uses upon request. Disclosure of this information to the NLRB is voluntary; however, failure to supply the information will cause the NLRB to decline to invoke its processes.

Radnet SFV RC petition Attachments:

Center	Address	City
Burbank Imaging X-Ray	3808 Riverside Dr., Ste. 120	Burbank, CA 91505
Burbank Breast Care Center	2601 W. Alameda Ave., Ste. 101	Burbank, CA 91505
Imaging Specialists of Burbank	1821 W. Olive Ave.	Burbank, CA 91506
Liberty Pacific Advanced Imaging Encino	16130 Ventura Blvd.	Encino, CA 91436
San Fernando Valley Interventional Radiology and Imaging Center	16311 Ventura Boulevard, Ste. 120	Encino, CA 91436
Imaging Specialists of Glendale	700 N. Central Avenue, Suite 100	Glendale, CA 91203
Marcia Ray Breastlink Women's Imaging Center	222 W. Eulalia Street	Glendale, CA 91204
San Fernando Valley Advanced Imaging Center	14860 Roscoe Blvd., Ste. 101	Panorama City, CA 91402
Imaging Specialists of Pasadena	630 S. Raymond Ave. Suite 210	Pasadena, CA 91105
Northridge Diagnostic Center – Walk-In X-Ray	8327 Reseda Blvd.	Reseda, CA 91325
Northridge Diagnostic Center	8227 Reseda Blvd.	Reseda, CA 91335
Liberty Pacific Advanced Imaging Tarzana and Breastlink Women's Imaging	18133 Ventura Blvd., Suite 100 and 200	Tarzana, CA 91356
Burbank Advanced Imaging Center	10101 Riverside Dr.	Toluca Lake, CA 91062
Santa Clarita Imaging	25775 W. McBean Pkwy, Ste. 100 and 216	Valencia, CA 91355
Vanowen Advanced Imaging	15243 Vanowen Street, Ste. 106	Van Nuys, CA 91405
Valley Hills Imaging	23101 Sherman Place, Suite 210	West Hills, CA 91307

5a.
Burbank, CA
Encino, CA
Glendale, CA
Panorama City, CA
Pasadena, CA
Reseda, CA
Tarzana, CA
Toluca Lake, CA
Valencia, CA
Van Nuys, CA
West Hills, CA

FORM NLRB-31

SUBPOENA DUCES TECUM

UNITED STATES OF AMERICA
NATIONAL LABOR RELATIONS BOARD

To Pieter Clayton, 225 W. Broadway, Suite 155
Glendale, CA 91204

As requested by RadNet Management, Inc. d/b/a San Fernando Valley Intervent. Radiology + Im. Ctr.

whose address is 16311 Ventura Blvd, Suite 120, Encino CA 91436
(Street) (City) (State) (ZIP)

YOU ARE HEREBY REQUIRED AND DIRECTED TO APPEAR BEFORE a Hearing Officer

of the National Labor Relations Board

at 11500 W. Olympic Blvd, Suite 600

in the City of Los Angeles

on January 30, 2018 at 9:00 am or any adjourned

or rescheduled date to testify in RadNet Management, Inc. d/b/a San Fernando Valley Interventional Radiology and Imaging Center (31-RM-209388) and RadNet Management, Inc. d/b/a San Fernando Valley Advanced Imaging Center (31-RM-209424)
(Case Name and Number)

And you are hereby required to bring with you and produce at said time and place the following books, records, correspondence, and documents:

SEE ATTACHMENT

If you do not intend to comply with the subpoena, within 5 days (excluding intermediate Saturdays, Sundays, and holidays) after the date the subpoena is received, you must petition in writing to revoke the subpoena. Unless filed through the Board's E-Filing system, the petition to revoke must be received on or before the official closing time of the receiving office on the last day for filing. If filed through the Board's E-Filing system, it may be filed up to 11:59 pm in the local time zone of the receiving office on the last day for filing. Prior to a hearing, the petition to revoke should be filed with the Regional Director; during a hearing, it should be filed with the Hearing Officer or Administrative Law Judge conducting the hearing. See Board's Rules and Regulations, 29 C.F.R Section 102.31(b) (unfair labor practice proceedings) and/or 29 C.F.R. Section 102.66(c) (representation proceedings) and 29 C.F.R Section 102.111(a)(1) and 102.111(b)(3) (time computation). Failure to follow these rules may result in the loss of any ability to raise objections to the subpoena in court.

B-1-ZPBK2D

Under the seal of the National Labor Relations Board, and by direction of the Board, this Subpoena is

Issued at Los Angeles, CA

Dated: January 17, 2018

Marvin Kaplan, Chairman

NOTICE TO WITNESS. Witness fees for attendance, subsistence, and mileage under this subpoena are payable by the party at whose request the witness is subpoenaed. A witness appearing at the request of the General Counsel of the National Labor Relations Board shall submit this subpoena with the voucher when claiming reimbursement.

PRIVACY ACT STATEMENT

Solicitation of the information on this form is authorized by the National Labor Relations Act (NLRA), 29 U.S.C. § 151 *et seq.* The principal use of the information is to assist the National Labor Relations Board (NLRB) in processing representation and/or unfair labor practice proceedings and related proceedings or litigation. The routine uses for the information are fully set forth in the Federal Register, 71 Fed. Reg. 74942-43 (Dec. 13, 2006). The NLRB will further explain these uses upon request. Disclosure of this information to the NLRB is mandatory in that failure to supply the information may cause the NLRB to seek enforcement of the subpoena in federal court.

Case 31-RM-209388

B-1-ZPBK2D

RETURN OF SERVICE

I certify that, being a person over 18 years of age, I duly served a copy of this subpoena

(Check method used.)

- ☐ by person
- ☐ by certified mail
- ☐ by registered mail
- ☐ by telegraph
- ☐ by leaving copy at principal office or place of business at

_____

_____

_____

on the named person on

_____

(Month, day, and year)

_____

(Name of person making service)

_____

(Official title, if any)

CERTIFICATION OF SERVICE

I certify that named person was in attendance as a witness at

_____

on

(Month, day or days, and year)

_____

(Name of person certifying)

_____

(Official title)

UNITED STATES OF AMERICA
NATIONAL LABOR RELATIONS BOARD
REGION 31

RADNET MANAGEMENT, INC. D/B/A SAN FERNANDO VALLEY INTERVENTIONAL RADIOLOGY AND IMAGING CENTER Petitioner *and* NATIONAL UNION OF HEALTHCARE WORKERS Labor Organization	Case No. 31-RM-209388

ATTACHMENT TO SUBPOENA *DUCES TECUM* NO. B-1-ZPBK2D

By service of Subpoena *Duces Tecum* No. B-1-ZPBK2D, RadNet Management, Inc. d/b/a San Fernando Valley Interventional Radiology and Imaging Center (hereafter, "RadNet") hereby seeks production of all requested documents within your possession, custody or control without regard to who has physical possession of them or who prepared the documents, and wherever retained.

Documents produced should be grouped and in the order that they are maintained in the normal course, and should include all files and file labels in which the documents, and extra copies of them, are located.

For any document withheld on a claim of privilege and/or under the work-product doctrine or any other claimed immunity from production, identify the date, author, recipients, title, general nature and privilege and / or immunity claimed.

If additional documents are discovered that fall within the terms of this request, the additional items shall be produced immediately.

DEFINITIONS

1.) "Documents," as used below, includes all material defined in Rule 34 of the Federal Rules of Civil Procedure, and are not limited to the specific examples listed, and further includes any written document of any nature whatsoever (*including but not limited to any emails or text messages*), any audio-tape, any video-tape, or any repository of any electronic data, such as computer hard drives or memory cards of portable communication devices.

2.) "Employee(s)," as used below, refers to the employees working out of any one or more of the facilities referenced by the Petition filed by the National Union of Healthcare Workers in Case No. 31-RC-208646. A copy of the Petition is attached hereto as "Exhibit A."

3.) "IAMAW," as used below, refers to the International Association of Machinists and Aerospace Workers, and / or any affiliated entity, including but not limited to the National Union of Healthcare Workers, together with

all current and former officers and employees thereof and any outside persons or entities retained to act on their behalf.

4.) The "Union," as used below, refers to the National Union of Healthcare Workers, and / or any affiliated entity, including but not limited to the International Association of Machinists and Aerospace Workers, together with all current and former officers and employees thereof and any outside persons or entities retained to act on their behalf.

5.) "You," as used below, refers to Mr. Pieter Clayton.

DOCUMENTS TO BE PRODUCED

1.) Any and all documents, including but not limited to any e-mails or text messages, in which any Employee informed You or the Union that he or she, or some other Employee, is opposed to representation by the Union or prefers not to communicate with the Union about representation by the Union. RadNet requests that any responsive documents initially be produced only to the hearing officer for *in camera* review.

2.) For the period October 1, 2017 to the present, any and all documents, including but not limited to phone records, that show, refer, evidence or relate to any communication by You, the Union or any Employee to the Los Angeles Police Department and / or any communication from the Los Angeles Police Department to the Union or any Employee.

4.) Any and all documents, including but not limited to any e-mails or text messages, sent by You or the Union to any Employee in which reference is made to any police report that may be filed or has been filed against any Employee, and / or any manager assigned to any facility operated by RadNet Management, Inc., and / or any facility operated by RadNet Management, Inc. RadNet requests that any responsive documents initially be produced only to the hearing officer for *in camera* review.

5.) Any and all documents, including but not limited to any e-mails or text messages, sent by any Employee to You or the Union in which the Employee makes any reference to any police report that may be filed or has been filed against any Employee, and / or any manager assigned to any facility operated by RadNet Management, Inc., and / or any facility operated by RadNet Management, Inc. RadNet requests that any responsive documents initially be produced only to the hearing officer for *in camera* review.

6.) Any and all documents, including but not limited to any e-mails or text messages, sent by You or the Union to the IAMAW in which reference is made to any police report that may be filed or has been filed against any Employee, and / or any manager assigned to any facility operated by RadNet Management, Inc., and / or any facility operated by RadNet Management,

Inc. RadNet requests that any responsive documents initially be produced only to the hearing officer for *in camera* review.

7.) Any and all documents, including but not limited to any e-mails or text messages, sent by the IAMAW to You or the Union in which the IAMAW makes any reference to any police report that may be filed or has been filed against any Employee, and / or any manager assigned to any facility operated by RadNet Management, Inc., and / or any facility operated by RadNet Management, Inc. RadNet requests that any responsive documents initially be produced only to the hearing officer for *in camera* review.

EXHIBIT A

FORM NLRB-502 (RC)
(4-15)

UNITED STATES GOVERNMENT
NATIONAL LABOR RELATIONS BOARD

RC PETITION

DO NOT WRITE IN THIS SPACE

Case No. 31-RC-208646 | Date Filed 10/26/2017

INSTRUCTIONS: Unless e-Filed using the Agency's website, www.nlrb.gov, submit an original of this Petition to an NLRB office in the Region in which the employer concerned is located. The petition must be accompanied by both a showing of interest (see 6b below) and a certificate of service showing service on the employer and all other parties named in the petition of: (1) the petition; (2) Statement of Position form (Form NLRB-505); and (3) Description of Representation Case Procedures (Form NLRB 4812). The showing of interest should only be filed with the NLRB and should not be served on the employer or any other party.

1. PURPOSE OF THIS PETITION: RC-CERTIFICATION OF REPRESENTATIVE - A substantial number of employees wish to be represented for purposes of collective bargaining by Petitioner and Petitioner desires to be certified as representative of the employees. The Petitioner alleges that the following circumstances exist and requests that the National Labor Relations Board proceed under its proper authority pursuant to Section 9 of the National Labor Relations Act.

2a. Name of Employer: RadNet Inc. and Radnet Management Inc. Joint Employers

2b. Address(es) of Establishment(s) involved (Street and number, city, State, ZIP code): see attachment

3a. Employer Representative – Name and Title: Christopher Catalano

3b. Address (If same as 2b – state same): 18133 Ventura Blvd, Suite 100, Tarzana, CA 91356

3c. Tel. No.: (818) 933-2020 ext 1261

3d. Cell No.: (805) 750-1013

3e. Fax No.:

3f. E-Mail Address: chris.catalano@radnet.com

4a. Type of Establishment (Factory, mine, wholesaler, etc.): Healthcare facility

4b. Principal product or service: Outpatient Imaging services

5a. City and State where unit is located: see attachment

5b. Description of Unit Involved

Included: All full-time, and regular part-time, per diem RN and Technical employees, employed by the employer at its facilities in the San Fernando Valley Region listed in 2b.

Excluded: All other employees, managers, confidential employees, guards, physicians, service, office clericals and supervisors as defined by the Act.

6a. No. of Employees in Unit: 115

6b. Do a substantial number (30% or more) of the employees in the unit wish to be represented by the Petitioner? Yes [✓] No [ ]

Check One:

[✓] 7a. Request for recognition as Bargaining Representative was made on (Date) 10/11/2017 and Employer declined recognition on or about 10/11/2017 (Date) (If no reply received, so state)

[ ] 7b. Petitioner is currently recognized as Bargaining Representative and desires certification under the Act

8a. Name of Recognized or Certified Bargaining Agent (If none, so state): none

8b. Address:

8c. Tel No.:

8d. Cell No.:

8e. Fax No.:

8f. E-Mail Address:

8g. Affiliation, if any:

8h. Date of Recognition or Certification:

8i. Expiration Date of Current or Most Recent Contract, if any (Month, Day, Year):

9. Is there now a strike or picketing at the Employer's establishment(s) involved? no If so, approximately how many employees are participating? _____

(Name of labor organization) _____, has picketed the Employer since (Month, Day, Year) _____

10. Organizations or individuals other than Petitioner and those named in items 8 and 9, which have claimed recognition as representatives and other organizations and individuals known to have a representative interest in any employees in the unit described in item 5b above. (If none, so state)

none

10a. Name:

10b. Address:

10c. Tel. No.:

10d. Cell No.:

10e. Fax No.:

10f. E-Mail Address:

11. Election Details: If the NLRB conducts an election in this matter, state your position with respect to any such election.

11a. Election Type: [ ] Manual [✓] Mail [ ] Mixed Manual/Mail

11b. Election Date(s): 11/7/17-11/21/17

11c. Election Time(s):

11d. Election Location(s):

12a. Full Name of Petitioner (including local name and number): National Union of Healthcare Workers

12b. Address (street and number, city, state, and ZIP code): 5801 Christie Ave. Suite 525, Emeryville, CA 94608

12c. Full name of national or international labor organization of which Petitioner is an affiliate or constituent (if none, so state): none

12d. Tel No.: (510) 834-2017

12e. Cell No.:

12f. Fax No.:

12g. E-Mail Address:

13. Representative of the Petitioner who will accept service of all papers for purposes of the representation proceeding.

13a. Name and Title: Sophia Mendoza, Organizer

13b. Address (street and number, city, state, and ZIP code): 225 W. Broadway, Suite 150, Glendale, CA 91204

13c. Tel No.:

13d. Cell No.: (213) 280-0051

13e. Fax No.: (818) 241-0141

13f. E-Mail Address: smendoza@nuhw.org

I declare that I have read the above petition and that the statements are true to the best of my knowledge and belief.

Name (Print): Florice Hoffman

Signature: Florice Hoffman

Title: Attorney

Date: 10/24/17

WILLFUL FALSE STATEMENTS ON THIS PETITION CAN BE PUNISHED BY FINE AND IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001)

PRIVACY ACT STATEMENT

Solicitation of the information on this form is authorized by the National Labor Relations Act (NLRA), 29 U.S.C. § 151 et seq. The principal use of the information is to assist the National Labor Relations Board (NLRB) in processing representation and related proceedings or litigation. The routine uses for the information are fully set forth in the Federal Register, 71 Fed. Reg. 74942-43 (Dec. 13, 2006). The NLRB will further explain these uses upon request. Disclosure of this information to the NLRB is voluntary; however, failure to supply the information will cause the NLRB to decline to invoke its processes.

Radnet SFV RC petition Attachments:

Center	Address	City
Burbank Imaging X-Ray	3808 Riverside Dr., Ste. 120	Burbank, CA 91505
Burbank Breast Care Center	2601 W. Alameda Ave., Ste. 101	Burbank, CA 91505
Imaging Specialists of Burbank	1821 W. Olive Ave.	Burbank, CA 91506
Liberty Pacific Advanced Imaging Encino	16130 Ventura Blvd.	Encino, CA 91436
San Fernando Valley Interventional Radiology and Imaging Center	16311 Ventura Boulevard, Ste. 120	Encino, CA 91436
Imaging Specialists of Glendale	700 N. Central Avenue, Suite 100	Glendale, CA 91203
Marcia Ray Breastlink Women's Imaging Center	222 W. Eulalia Street	Glendale, CA 91204
San Fernando Valley Advanced Imaging Center	14860 Roscoe Blvd., Ste. 101	Panorama City, CA 91402
Imaging Specialists of Pasadena	630 S. Raymond Ave. Suite 210	Pasadena, CA 91105
Northridge Diagnostic Center – Walk-In X-Ray	8327 Reseda Blvd.	Reseda, CA 91325
Northridge Diagnostic Center	8227 Reseda Blvd.	Reseda, CA 91335
Liberty Pacific Advanced Imaging Tarzana and Breastlink Women's Imaging	18133 Ventura Blvd., Suite 100 and 200	Tarzana, CA 91356
Burbank Advanced Imaging Center	10101 Riverside Dr.	Toluca Lake, CA 91062
Santa Clarita Imaging	25775 W. McBean Pkwy, Ste. 100 and 216	Valencia, CA 91355
Vanowen Advanced Imaging	15243 Vanowen Street, Ste. 106	Van Nuys, CA 91405
Valley Hills Imaging	23101 Sherman Place, Suite 210	West Hills, CA 91307

5a.
Burbank, CA
Encino, CA
Glendale, CA
Panorama City, CA
Pasadena, CA
Reseda, CA
Tarzana, CA
Toluca Lake, CA
Valencia, CA
Van Nuys, CA
West Hills, CA

FORM NLRB-32

Emp. Ex. 9

SUBPOENA

UNITED STATES OF AMERICA
NATIONAL LABOR RELATIONS BOARD

To Cristian Murguia, 225 West Broadway, Suite 155 Glendale, CA 91204

As requested by RadNet Management, Inc. d/b/a San Fernando Valley Advanced Imaging Center

whose address is 14860 Roscoe Blvd, Suite 101 Panorama City CA 91402
(Street) (City) (State) (ZIP)

YOU ARE HEREBY REQUIRED AND DIRECTED TO APPEAR BEFORE a Hearing Officer of the National Labor Relations Board

at 11500 W. Olympic Blvd, Suite 600

in the City of Los Angeles

on January 30, 2018 at 9:00 am or any adjourned

or rescheduled date to testify in RadNet Management, Inc. d/b/a San Fernando Valley Interventional Radiology and Imaging Center and RadNet Management, Inc. d/b/a San Fernando Valley Advanced Imaging Center
Cases 31-RM-209388 and 31-RM-209424
(Case Name and Number)

If you do not intend to comply with the subpoena, within 5 days (excluding intermediate Saturdays, Sundays, and holidays) after the date the subpoena is received, you must petition in writing to revoke the subpoena. Unless filed through the Board's E-Filing system, the petition to revoke must be received on or before the official closing time of the receiving office on the last day for filing. If filed through the Board's E-Filing system, it may be filed up to 11:59 pm in the local time zone of the receiving office on the last day for filing. Prior to a hearing, the petition to revoke should be filed with the Regional Director; during a hearing, it should be filed with the Hearing Officer or Administrative Law Judge conducting the hearing. See Board's Rules and Regulations, 29 C.F.R Section 102.31(b) (unfair labor practice proceedings) and/or 29 C.F.R. Section 102.66(c) (representation proceedings) and 29 C.F.R Section 102.111(a)(1) and 102.111(b)(3) (time computation). Failure to follow these rules may result in the loss of any ability to raise objections to the subpoena in court.

A-1-ZUMEFP

Under the seal of the National Labor Relations Board, and by direction of the Board, this Subpoena is

Issued at

Dated:

Marvin Kaplan, Chairman

NOTICE TO WITNESS. Witness fees for attendance, subsistence, and mileage under this subpoena are payable by the party at whose request the witness is subpoenaed. A witness appearing at the request of the General Counsel of the National Labor Relations Board shall submit this subpoena with the voucher when claiming reimbursement.

PRIVACY ACT STATEMENT

Solicitation of the information on this form is authorized by the National Labor Relations Act (NLRA), 29 U.S.C. § 151 *et seq.* The principal use of the information is to assist the National Labor Relations Board (NLRB) in processing representation and/or unfair labor practice proceedings and related proceedings or litigation. The routine uses for the information are fully set forth in the Federal Register, 71 Fed. Reg. 74942-43 (Dec. 13, 2006). The NLRB will further explain these uses upon request. Disclosure of this information to the NLRB is mandatory in that failure to supply the information may cause the NLRB to seek enforcement of the subpoena in federal court.

Case 31-RM-209388

A-1-ZUMEFP

RETURN OF SERVICE

I certify that, being a person over 18 years of age, I duly served a copy of this subpoena

(Check method used.)

- ☐ by person
- ☐ by certified mail
- ☐ by registered mail
- ☐ by telegraph
- ☐ by leaving copy at principal office or place of business at

_____

_____

_____

on the named person on

_____

(Month, day, and year)

_____

(Name of person making service)

_____

(Official title, if any)

CERTIFICATION OF SERVICE

I certify that named person was in attendance as a witness at

_____

on

(Month, day or days, and year)

_____

(Name of person certifying)

_____

(Official title)

FORM NLRB-32

SUBPOENA

UNITED STATES OF AMERICA
NATIONAL LABOR RELATIONS BOARD

To Cristian Murguia, 225 West Broadway, Suite 155
Glendale, CA 91204

As requested by Radnet Management, Inc. d/b/a ~~Radnet~~ San
Fernando Valley Interventional Radiology + Imaging Center

whose address is 16311 Ventura Blvd, Suite 120, Encino, CA 91436
(Street) (City) (State) (ZIP)

YOU ARE HEREBY REQUIRED AND DIRECTED TO APPEAR BEFORE a Hearing Officer

of the National Labor Relations Board

at 11500 W. Olympic Blvd, Suite 1600

in the City of Los Angeles

on January 30, 2018 at 9:00 am or any adjourned

or rescheduled date to testify in RadNet Management, Inc. d/b/a San Fernando Valley Interventional Radiology and Imaging Center and RadNet Management, Inc. d/b/a San Fernando Valley Advanced Imaging Center
Cases 31-RM-209388 and 31-RM-209424
(Case Name and Number)

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A-1-ZUM8QF

Under the seal of the National Labor Relations Board, and by direction of the Board, this Subpoena is

Issued at

Dated:

Marvin Kaplan, Chairman

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Case 31-RM-209388

A-1-ZUM8QF

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(Check method used.)

- ☐ by person
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- ☐ by registered mail
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- ☐ by leaving copy at principal office or place of business at

_____

_____

_____

on the named person on

_____

(Month, day, and year)

_____

(Name of person making service)

_____

(Official title, if any)

CERTIFICATION OF SERVICE

I certify that named person was in attendance as a witness at

_____

on

(Month, day or days, and year)

_____

(Name of person certifying)

_____

(Official title)

FORM NLRB-31

SUBPOENA DUCES TECUM

UNITED STATES OF AMERICA
NATIONAL LABOR RELATIONS BOARD

To Cristian Murguia, 225 West Broadway, Suite 155 Glendale, CA 91204

As requested by RadNet Management, Inc, d/b/a San Fernando Valley Intervent. Radiology + Imaging Ctr.

whose address is 14811 Ventura Blvd, Suite 120, Encino, CA 91436
(Street) (City) (State) (ZIP)

YOU ARE HEREBY REQUIRED AND DIRECTED TO APPEAR BEFORE a Hearing Officer

of the National Labor Relations Board

at 11500 W. Olympic Blvd., Suite 600

in the City of Los Angeles

on January 30, 2018 at 9:00 am or any adjourned

or rescheduled date to testify in RadNet Management, Inc. d/b/a San Fernando Valley Interventional Radiology and Imaging Center and RadNet Management, Inc. d/b/a San Fernando Valley Advanced Imaging Center Cases 31-RM-209388 and 31-RM-209424
(Case Name and Number)

And you are hereby required to bring with you and produce at said time and place the following books, records, correspondence, and documents:

SEE ATTACHMENT

If you do not intend to comply with the subpoena, within 5 days (excluding intermediate Saturdays, Sundays, and holidays) after the date the subpoena is received, you must petition in writing to revoke the subpoena. Unless filed through the Board's E-Filing system, the petition to revoke must be received on or before the official closing time of the receiving office on the last day for filing. If filed through the Board's E-Filing system, it may be filed up to 11:59 pm in the local time zone of the receiving office on the last day for filing. Prior to a hearing, the petition to revoke should be filed with the Regional Director; during a hearing, it should be filed with the Hearing Officer or Administrative Law Judge conducting the hearing. See Board's Rules and Regulations, 29 C.F.R Section 102.31(b) (unfair labor practice proceedings) and/or 29 C.F.R. Section 102.66(c) (representation proceedings) and 29 C.F.R Section 102.111(a)(1) and 102.111(b)(3) (time computation). Failure to follow these rules may result in the loss of any ability to raise objections to the subpoena in court.

B-1-ZUMHKH

Under the seal of the National Labor Relations Board, and by direction of the Board, this Subpoena is

Issued at

Dated:

Marvin Kaplan, Chairman

NOTICE TO WITNESS. Witness fees for attendance, subsistence, and mileage under this subpoena are payable by the party at whose request the witness is subpoenaed. A witness appearing at the request of the General Counsel of the National Labor Relations Board shall submit this subpoena with the voucher when claiming reimbursement.

PRIVACY ACT STATEMENT

Solicitation of the information on this form is authorized by the National Labor Relations Act (NLRA), 29 U.S.C. § 151 *et seq.* The principal use of the information is to assist the National Labor Relations Board (NLRB) in processing representation and/or unfair labor practice proceedings and related proceedings or litigation. The routine uses for the information are fully set forth in the Federal Register, 71 Fed. Reg. 74942-43 (Dec. 13, 2006). The NLRB will further explain these uses upon request. Disclosure of this information to the NLRB is mandatory in that failure to supply the information may cause the NLRB to seek enforcement of the subpoena in federal court.

Case 31-RM-209388

B-1-ZUMHKH

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(Check method used.)

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on the named person on

_____

(Month, day, and year)

_____

(Name of person making service)

_____

(Official title, if any)

CERTIFICATION OF SERVICE

I certify that named person was in attendance as a witness at

_____

on

(Month, day or days, and year)

_____

(Name of person certifying)

_____

(Official title)

UNITED STATES OF AMERICA
NATIONAL LABOR RELATIONS BOARD
REGION 31

RADNET MANAGEMENT, INC. D/B/A SAN FERNANDO VALLEY INTERVENTIONAL RADIOLOGY AND IMAGING CENTER Petitioner *and* NATIONAL UNION OF HEALTHCARE WORKERS Labor Organization	Case No. 31-RM-209388

ATTACHMENT TO SUBPOENA *DUCES TECUM* NO. B-1-ZUMHKH

By service of Subpoena *Duces Tecum* No. B-1-ZUMHKH, RadNet Management, Inc. d/b/a San Fernando Valley Interventional Radiology and Imaging Center (hereafter, "RadNet") hereby seeks production of all requested documents within your possession, custody or control without regard to who has physical possession of them or who prepared the documents, and wherever retained.

Documents produced should be grouped and in the order that they are maintained in the normal course, and should include all files and file labels in which the documents, and extra copies of them, are located.

For any document withheld on a claim of privilege and/or under the work-product doctrine or any other claimed immunity from production, identify the date, author, recipients, title, general nature and privilege and / or immunity claimed.

If additional documents are discovered that fall within the terms of this request, the additional items shall be produced immediately.

DEFINITIONS

1.) "Documents," as used below, includes all material defined in Rule 34 of the Federal Rules of Civil Procedure, and are not limited to the specific examples listed, and further includes any written document of any nature whatsoever (*including but not limited to any emails or text messages*), any audio-tape, any video-tape, or any repository of any electronic data, such as computer hard drives or memory cards of portable communication devices.

2.) "Employee(s)," as used below, refers to the employees working out of any one or more of the facilities referenced by the Petition filed by the National Union of Healthcare Workers in Case No. 31-RC-208646. A copy of the Petition is attached hereto as "Exhibit A."

3.) "IAMAW," as used below, refers to the International Association of Machinists and Aerospace Workers, and / or any affiliated entity, including but not limited to the National Union of Healthcare Workers, together with

all current and former officers and employees thereof and any outside persons or entities retained to act on their behalf.

4.) The "Union," as used below, refers to the National Union of Healthcare Workers, and / or any affiliated entity, including but not limited to the International Association of Machinists and Aerospace Workers, together with all current and former officers and employees thereof and any outside persons or entities retained to act on their behalf.

5.) "You," as used below, refers to Mr. Cristian Murguia.

DOCUMENTS TO BE PRODUCED

1.) Any and all documents, including but not limited to any e-mails or text messages, in which any Employee informed You or the Union that he or she, or some other Employee, is opposed to representation by the Union or prefers not to communicate with the Union about representation by the Union. RadNet requests that any responsive documents initially be produced only to the hearing officer for *in camera* review.

2.) For the period October 1, 2017 to the present, any and all documents, including but not limited to phone records, that show, refer, evidence or relate to any communication by You, the Union or any Employee to the Los Angeles Police Department and / or any communication from the Los Angeles Police Department to the Union or any Employee.

4.) Any and all documents, including but not limited to any e-mails or text messages, sent by You or the Union to any Employee in which reference is made to any police report that may be filed or has been filed against any Employee, and / or any manager assigned to any facility operated by RadNet Management, Inc., and / or any facility operated by RadNet Management, Inc. RadNet requests that any responsive documents initially be produced only to the hearing officer for *in camera* review.

5.) Any and all documents, including but not limited to any e-mails or text messages, sent by any Employee to You or the Union in which the Employee makes any reference to any police report that may be filed or has been filed against any Employee, and / or any manager assigned to any facility operated by RadNet Management, Inc., and / or any facility operated by RadNet Management, Inc. RadNet requests that any responsive documents initially be produced only to the hearing officer for *in camera* review.

6.) Any and all documents, including but not limited to any e-mails or text messages, sent by You or the Union to the IAMAW in which reference is made to any police report that may be filed or has been filed against any Employee, and / or any manager assigned to any facility operated by RadNet Management, Inc., and / or any facility operated by RadNet Management,

Inc. RadNet requests that any responsive documents initially be produced only to the hearing officer for *in camera* review.

7.) Any and all documents, including but not limited to any e-mails or text messages, sent by the IAMAW to You or the Union in which the IAMAW makes any reference to any police report that may be filed or has been filed against any Employee, and / or any manager assigned to any facility operated by RadNet Management, Inc., and / or any facility operated by RadNet Management, Inc. RadNet requests that any responsive documents initially be produced only to the hearing officer for *in camera* review.

EXHIBIT A

FORM NLRB-502 (RC)
(4-15)

UNITED STATES GOVERNMENT
NATIONAL LABOR RELATIONS BOARD

RC PETITION

DO NOT WRITE IN THIS SPACE

Case No.	Date Filed
31-RC-208646	10/26/2017

INSTRUCTIONS: Unless e-Filed using the Agency's website, www.nlrb.gov, submit an original of this Petition to an NLRB office in the Region in which the employer concerned is located. The petition must be accompanied by both a showing of interest (see 6b below) and a certificate of service showing service on the employer and all other parties named in the petition of: (1) the petition; (2) Statement of Position form (Form NLRB-505); and (3) Description of Representation Case Procedures (Form NLRB 4812). The showing of interest should only be filed with the NLRB and should not be served on the employer or any other party.

1. PURPOSE OF THIS PETITION: RC-CERTIFICATION OF REPRESENTATIVE - A substantial number of employees wish to be represented for purposes of collective bargaining by Petitioner and Petitioner desires to be certified as representative of the employees. The Petitioner alleges that the following circumstances exist and requests that the National Labor Relations Board proceed under its proper authority pursuant to Section 9 of the National Labor Relations Act.

2a. Name of Employer: RadNet Inc. and Radnet Management Inc. Joint Employers

2b. Address(es) of Establishment(s) involved (Street and number, city, State, ZIP code): see attachment

3a. Employer Representative – Name and Title: Christopher Catalano

3b. Address (If same as 2b – state same): 18133 Ventura Blvd, Suite 100, Tarzana, CA 91356

3c. Tel. No.: (818) 933-2020 ext 1261

3d. Cell No.: (805) 750-1013

3e. Fax No.:

3f. E-Mail Address: chris.catalano@radnet.com

4a. Type of Establishment (Factory, mine, wholesaler, etc.): Healthcare facility

4b. Principal product or service: Outpatient Imaging services

5a. City and State where unit is located: see attachment

5b. Description of Unit Involved

Included: All full-time, and regular part-time, per diem RN and Technical employees, employed by the employer at its facilities in the San Fernando Valley Region listed in 2b.

Excluded: All other employees, managers, confidential employees, guards, physicians, service, office clericals and supervisors as defined by the Act.

6a. No. of Employees in Unit: 115

6b. Do a substantial number (30% or more) of the employees in the unit wish to be represented by the Petitioner? Yes [✓] No [ ]

Check One:
[✓] 7a. Request for recognition as Bargaining Representative was made on (Date) 10/11/2017 and Employer declined recognition on or about 10/11/2017 (Date) (If no reply received, so state)
[ ] 7b. Petitioner is currently recognized as Bargaining Representative and desires certification under the Act.

8a. Name of Recognized or Certified Bargaining Agent (If none, so state): none

8b. Address:

8c. Tel No.:

8d. Cell No.:

8e. Fax No.:

8f. E-Mail Address:

8g. Affiliation, if any:

8h. Date of Recognition or Certification:

8i. Expiration Date of Current or Most Recent Contract, if any (Month, Day, Year):

9. Is there now a strike or picketing at the Employer's establishment(s) involved? no if so, approximately how many employees are participating? _____

(Name of labor organization) _____ has picketed the Employer since (Month, Day, Year) _____

10. Organizations or individuals other than Petitioner and those named in items 8 and 9, which have claimed recognition as representatives and other organizations and individuals known to have a representative interest in any employees in the unit described in item 5b above. (If none, so state)
none

10a. Name:

10b. Address:

10c. Tel. No.:

10d. Cell No.:

10e. Fax No.:

10f. E-Mail Address:

11. Election Details: If the NLRB conducts an election in this matter, state your position with respect to any such election:

11a. Election Type: [ ] Manual [✓] Mail [ ] Mixed Manual/Mail

11b. Election Date(s): ~~11/7/17~~ 11/7/17-11/21/17

11c. Election Time(s):

11d. Election Location(s):

12a. Full Name of Petitioner (including local name and number): National Union of Healthcare Workers

12b. Address (street and number, city, state, and ZIP code): 5801 Christie Ave. Suite 525, Emeryville, CA 94608

12c. Full name of national or international labor organization of which Petitioner is an affiliate or constituent (If none, so state): none

12d. Tel No.: (510) 834-2017

12e. Cell No.:

12f. Fax No.:

12g. E-Mail Address:

13. Representative of the Petitioner who will accept service of all papers for purposes of the representation proceeding.

13a. Name and Title: Sophia Mendoza, Organizer

13b. Address (street and number, city, state, and ZIP code): 325 W. Broadway, Suite 15b, Glendale, CA 91204

13c. Tel. No.:

13d. Cell No.: (213) 280-0051

13e. Fax No.: (818) 241-0141

13f. E-Mail Address: smendoza@nuhw.org

I declare that I have read the above petition and that the statements are true to the best of my knowledge and belief.

Name (Print)	Signature	Title	Date
Florice Hoffman	Florice Hoffman	Attorney	10/24/17

WILLFUL FALSE STATEMENTS ON THIS PETITION CAN BE PUNISHED BY FINE AND IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001)

PRIVACY ACT STATEMENT

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Radnet SFV RC petition Attachments:

Center	Address	City
Burbank Imaging X-Ray	3808 Riverside Dr., Ste. 120	Burbank, CA 91505
Burbank Breast Care Center	2601 W. Alameda Ave., Ste. 101	Burbank, CA 91505
Imaging Specialists of Burbank	1821 W. Olive Ave.	Burbank, CA 91506
Liberty Pacific Advanced Imaging Encino	16130 Ventura Blvd.	Encino, CA 91436
San Fernando Valley Interventional Radiology and Imaging Center	16311 Ventura Boulevard, Ste. 120	Encino, CA 91436
Imaging Specialists of Glendale	700 N. Central Avenue, Suite 100	Glendale, CA 91203
Marcia Ray Breastlink Women's Imaging Center	222 W. Eulalia Street	Glendale, CA 91204
San Fernando Valley Advanced Imaging Center	14860 Roscoe Blvd., Ste. 101	Panorama City, CA 91402
Imaging Specialists of Pasadena	630 S. Raymond Ave. Suite 210	Pasadena, CA 91105
Northridge Diagnostic Center – Walk-In X-Ray	8327 Reseda Blvd.	Reseda, CA 91325
Northridge Diagnostic Center	8227 Reseda Blvd.	Reseda, CA 91335
Liberty Pacific Advanced Imaging Tarzana and Breastlink Women's Imaging	18133 Ventura Blvd., Suite 100 and 200	Tarzana, CA 91356
Burbank Advanced Imaging Center	10101 Riverside Dr.	Toluca Lake, CA 91062
Santa Clarita Imaging	25775 W. McBean Pkwy, Ste. 100 and 216	Valencia, CA 91355
Vanowen Advanced Imaging	15243 Vanowen Street, Ste. 106	Van Nuys, CA 91405
Valley Hills Imaging	23101 Sherman Place, Suite 210	West Hills, CA 91307

5a.
Burbank, CA
Encino, CA
Glendale, CA
Panorama City, CA
Pasadena, CA
Reseda, CA
Tarzana, CA
Toluca Lake, CA
Valencia, CA
Van Nuys, CA
West Hills, CA

FORM NLRB-31

SUBPOENA DUCES TECUM

UNITED STATES OF AMERICA
NATIONAL LABOR RELATIONS BOARD

To Cristian Murguia, 225 West Broadway, Suite 155 Glendale, CA 91204

As requested by RadNet Management, Inc. d/b/a San Fernando Valley Adv. Imaging Ctr.

whose address is 14860 Roscoe Blvd, Suite 101, Panorama City, CA 91402
(Street) (City) (State) (ZIP)

YOU ARE HEREBY REQUIRED AND DIRECTED TO APPEAR BEFORE a Hearing Officer

of the National Labor Relations Board

at 11500 W. Olympic Blvd, Suite 1600

in the City of Los Angeles

on January 30, 2018 at 9:00 am or any adjourned

or rescheduled date to testify in RadNet Management, Inc. d/b/a San Fernando Valley Interventional Radiology and Imaging Center and RadNet Management, Inc. d/b/a San Fernando Valley Advanced Imaging Center
Cases 31-RM-209388 and 31-RM-209424
(Case Name and Number)

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B-1-ZUMILF

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Issued at

Dated:

Marvin Kaplan, Chairman

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Case 31-RM-209388

B-1-ZUMILF

RETURN OF SERVICE

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(Check method used.)

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_____

_____

on the named person on

_____

(Month, day, and year)

_____

(Name of person making service)

_____

(Official title, if any)

CERTIFICATION OF SERVICE

I certify that named person was in attendance as a witness at

_____

on

(Month, day or days, and year)

_____

(Name of person certifying)

_____

(Official title)

UNITED STATES OF AMERICA
NATIONAL LABOR RELATIONS BOARD
REGION 31

RADNET MANAGEMENT, INC. D/B/A SAN FERNANDO VALLEY ADVANCED IMAGING CENTER Petitioner *and* NATIONAL UNION OF HEALTHCARE WORKERS Labor Organization	Case No. 31-RM-209424

ATTACHMENT TO SUBPOENA *DUCES TECUM* NO. B-1-ZUMILF

By service of Subpoena *Duces Tecum* No. B-1-ZUMILF, RadNet Management, Inc. d/b/a San Fernando Valley Advanced Imaging Center (hereafter, "RadNet") hereby seeks production of all requested documents within your possession, custody or control without regard to who has physical possession of them or who prepared the documents, and wherever retained.

Documents produced should be grouped and in the order that they are maintained in the normal course, and should include all files and file labels in which the documents, and extra copies of them, are located.

For any document withheld on a claim of privilege and/or under the work-product doctrine or any other claimed immunity from production, identify the date, author, recipients, title, general nature and privilege and / or immunity claimed.

If additional documents are discovered that fall within the terms of this request, the additional items shall be produced immediately.

DEFINITIONS

1.) "Documents," as used below, includes all material defined in Rule 34 of the Federal Rules of Civil Procedure, and are not limited to the specific examples listed, and further includes any written document of any nature whatsoever (*including but not limited to any emails or text messages*), any audio-tape, any video-tape, or any repository of any electronic data, such as computer hard drives or memory cards of portable communication devices.

2.) "Employee(s)," as used below, refers to the employees working out of any one or more of the facilities referenced by the Petition filed by the National Union of Healthcare Workers in Case No. 31-RC-208646. A copy of the Petition is attached hereto as "Exhibit A."

3.) "IAMAW," as used below, refers to the International Association of Machinists and Aerospace Workers, and / or any affiliated entity, including but not limited to the National Union of Healthcare Workers, together with

all current and former officers and employees thereof and any outside persons or entities retained to act on their behalf.

4.) The "Union," as used below, refers to the National Union of Healthcare Workers, and / or any affiliated entity, including but not limited to the International Association of Machinists and Aerospace Workers, together with all current and former officers and employees thereof and any outside persons or entities retained to act on their behalf.

5.) "You," as used below, refers to Mr. Cristian Murguia.

DOCUMENTS TO BE PRODUCED

1.) Any and all documents, including but not limited to any e-mails or text messages, in which any Employee informed You or the Union that he or she, or some other Employee, is opposed to representation by the Union or prefers not to communicate with the Union about representation by the Union. RadNet requests that any responsive documents initially be produced only to the hearing officer for *in camera* review.

2.) For the period October 1, 2017 to the present, any and all documents, including but not limited to phone records, that show, refer, evidence or relate to any communication by You, the Union or any Employee to the Los Angeles Police Department and / or any communication from the Los Angeles Police Department to the Union or any Employee.

4.) Any and all documents, including but not limited to any e-mails or text messages, sent by You or the Union to any Employee in which reference is made to any police report that may be filed or has been filed against any Employee, and / or any manager assigned to any facility operated by RadNet Management, Inc., and / or any facility operated by RadNet Management, Inc. RadNet requests that any responsive documents initially be produced only to the hearing officer for *in camera* review.

5.) Any and all documents, including but not limited to any e-mails or text messages, sent by any Employee to You or the Union in which the Employee makes any reference to any police report that may be filed or has been filed against any Employee, and / or any manager assigned to any facility operated by RadNet Management, Inc., and / or any facility operated by RadNet Management, Inc. RadNet requests that any responsive documents initially be produced only to the hearing officer for *in camera* review.

6.) Any and all documents, including but not limited to any e-mails or text messages, sent by You or the Union to the IAMAW in which reference is made to any police report that may be filed or has been filed against any Employee, and / or any manager assigned to any facility operated by RadNet Management, Inc., and / or any facility operated by RadNet Management,

Inc. RadNet requests that any responsive documents initially be produced only to the hearing officer for *in camera* review.

7.) Any and all documents, including but not limited to any e-mails or text messages, sent by the IAMAW to You or the Union in which the IAMAW makes any reference to any police report that may be filed or has been filed against any Employee, and / or any manager assigned to any facility operated by RadNet Management, Inc., and / or any facility operated by RadNet Management, Inc. RadNet requests that any responsive documents initially be produced only to the hearing officer for *in camera* review.

EXHIBIT A

Radnet SFV RC petition Attachments:

Center	Address	City
Burbank Imaging X-Ray	3808 Riverside Dr., Ste. 120	Burbank, CA 91505
Burbank Breast Care Center	2601 W. Alameda Ave., Ste. 101	Burbank, CA 91505
Imaging Specialists of Burbank	1821 W. Olive Ave.	Burbank, CA 91506
Liberty Pacific Advanced Imaging Encino	16130 Ventura Blvd.	Encino, CA 91436
San Fernando Valley Interventional Radiology and Imaging Center	16311 Ventura Boulevard, Ste. 120	Encino, CA 91436
Imaging Specialists of Glendale	700 N. Central Avenue, Suite 100	Glendale, CA 91203
Marcia Ray Breastlink Women's Imaging Center	222 W. Eulalia Street	Glendale, CA 91204
San Fernando Valley Advanced Imaging Center	14860 Roscoe Blvd., Ste. 101	Panorama City, CA 91402
Imaging Specialists of Pasadena	630 S. Raymond Ave. Suite 210	Pasadena, CA 91105
Northridge Diagnostic Center – Walk-In X-Ray	8327 Reseda Blvd.	Reseda, CA 91325
Northridge Diagnostic Center	8227 Reseda Blvd.	Reseda, CA 91335
Liberty Pacific Advanced Imaging Tarzana and Breastlink Women's Imaging	18133 Ventura Blvd., Suite 100 and 200	Tarzana, CA 91356
Burbank Advanced Imaging Center	10101 Riverside Dr.	Toluca Lake, CA 91062
Santa Clarita Imaging	25775 W. McBean Pkwy, Ste. 100 and 216	Valencia, CA 91355
Vanowen Advanced Imaging	15243 Vanowen Street, Ste. 106	Van Nuys, CA 91405
Valley Hills Imaging	23101 Sherman Place, Suite 210	West Hills, CA 91307

5a.
Burbank, CA
Encino, CA
Glendale, CA
Panorama City, CA
Pasadena, CA
Reseda, CA
Tarzana, CA
Toluca Lake, CA
Valencia, CA
Van Nuys, CA
West Hills, CA