



UNITED STATES GOVERNMENT  
NATIONAL LABOR RELATIONS BOARD

REGION 20  
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July 9, 2018

**Via E-Filing:**

Gary Shinnars  
Executive Secretary  
National Labor Relations Board  
1099 14th Street, N.W.  
Washington, DC 20570

Re: SBM Site Services, LLC  
Case 20-CA-157693 et al.

Dear Mr. Shinnars:

This letter constitutes Counsel for the General Counsel's response to the letter filed by Respondent SBM Site Services, LLC on June 22, 2018 in regard to the above-referenced matter. In its letter, Respondent cites *Cellco Partnership d/b/a Verizon Wireless v. NLRB*, USCA Case No. 17-1158 as new authority to support its position that it did not terminate employees Quintanilla and Prieto in retaliation for their union activity. As set forth in pages 14-29 of General Counsel's Answering Brief to Respondent's Exceptions, the credited facts in this case are distinguishable from those in *Cellco Partnership d/b/a Verizon Wireless v. NLRB*.

Very truly yours,

/s/ Carmen León

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**UNITED STATES OF AMERICA  
BEFORE THE NATIONAL LABOR RELATIONS BOARD  
REGION 20**

**SBM SITE SERVICES, LLC**

**and**

**Case 20-CA-157693; 20-CA-  
157705; 20-CA-157761; 20-  
CA-157884**

**JOSE LA SERNA, ESTER QUINTANILLA,  
ADILIO H. PRIETO AND LUZ DARY DUQUE  
LOPEZ, an Individual**

**CERTIFICATE OF SERVICE OF COUNSEL FOR GENERAL COUNSEL'S LETTER  
TO THE BOARD RE: SBM SITE SERVICES, LLC DATED JULY 9, 2018**

I, the undersigned employee of the National Labor Relations Board, being duly sworn, say that on July 9, 2018, I served the above-entitled document(s) by **electronic mail** upon the following persons, addressed to them at the following addresses:

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July 9, 2018

Date

Min-Kuk Song, FA NLRB

Name

**/s/ Min-Kuk Song**

Signature