

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

In the matter of:

AIM AEROSPACE SUMNER, INC.,

Respondent,

and

INTERNATIONAL ASSOCIATION OF
MACHINISTS, DISTRICT 751,

Charging Party.

CASE NOS. 19-CA-203455
19-CA-203586

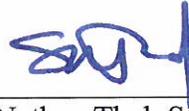
UNION'S BRIEF ON EMPLOYER'S CROSS-EXCEPTIONS

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For the reasons argued by the General Counsel, and also for the reasons outlined in the Charging Party's Exceptions, the Charging Party opposes Respondent's Cross-Exceptions. There is no evidence in the record to support the Employer's post-hoc arguments for suddenly excluding external applicants from its hiring process and moving quickly to promote the decertification petitioner during the same time that she was actively and openly gathering signatures for decertification, and shortly before the petition was presented to the same Company representatives who confirmed the promotion.

Respectfully submitted this 11th day of July, 2018.



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CERTIFICATE OF SERVICE

I certify that on this 11th day of July, 2018, I caused the original of the Union's Brief On Employer's Cross-Exceptions to ALJ Decision to be filed with the NLRB and sent via facsimile and electronic mail to:

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