KAMER ZUCKER ABBOTT
Gregory J. Kamer NBR # 0270
Nicole A. Young NBR # 13423
Jen J. Sarafina NBR #9679
Jody M. Florence NBR #6645
3000 West Charleston Boulevard, Suite 3
Las Vegas, Nevada 89102-1990
Tel. (702) 259-8640
Fax (702) 259-8646
gkamer@kzalaw.com
nyoung@kzalaw.com
jsarafina@kzalaw.com
jflorence@kzalaw.com

Attorneys for Employers
David Saxe Productions, LLC
And V Theater Group, LLC

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

DAVID SAXE PRODUCTIONS, LLC AND V THEATER GROUP, LLC, **Joint Employers** **and** **INTERNATIONAL ALLIANCE OF THEATRICAL STAGE EMPLOYEES AND MOVING PICTURE TECHNICIANS, ARTISTS, AND ALLIED CRAFTS OF THE UNITED STATES AND CANADA, LOCAL 720** **Union**	**Case No. 28-CA-219225** **Case No. 28-RC-219130**

EMPLOYER'S RESPONSE TO GENERAL COUNSEL'S MOTION TO AMEND CONSOLIDATED COMPLAINT

The Employer in this matter, David Saxe Productions, LLC and V Theater Group, LLC, hereby responds to the General Counsel's Motion to Amend Consolidated Complaint dated September 20, 2018 as follows:

1. The Employer does not oppose the Motion to Amend.

2. The Employer's Answer and Affirmative Defenses to Consolidated Complaint, filed on September 4, 2018, remains unchanged. The Employer specifically denies the allegations contained in amended Paragraph 7(e) and amended Paragraph 7(g)(iii).

DATED this 5th day of October, 2018.

KAMER ZUCKER ABBOTT

By: _____

Gregory J. Kamer NBR# 0270
Nicole A. Young NBR# 13423
Jen J. Sarafina NBR #9679
Jody M. Florence NBR #6645
3000 West Charleston Boulevard, Suite 3
Las Vegas, Nevada 89102-1990
Tel. (702) 259-8640
Fax (702) 259-8646
gkamer@kzalaw.com
nyoung@kzalaw.com
jsarafina@kzalaw.com
jflorence@kzalaw.com

Attorneys for Employer
David Saxe Productions, LLC
And V Theater Group, LLC

CERTIFICATE OF SERVICE

I hereby certify that on this 5th day of October 2018, I did serve a copy of **EMPLOYER'S RESPONSE TO GENERAL COUNSEL'S MOTOIN TO AMEND COMPLAINT** as follows:

Elise Oviedo, Esq
National Labor Relations Board, Region 28
300 Las Vegas Boulevard South, Suite 2-901
Las Vegas, Nevada 89101

VIA ELECTRONIC FILING

Rodolfo "Rudy" Martinez
National Labor Relations Board, Region 28
Albuquerque Resident Office
421 Gold Avenue SW, Suite 310
Albuquerque, New Mexico 87103

VIA ELECTRONIC FILING

Cornele A. Overstreet, Regional Director
National Labor Relations Board, Region 28
Resident Office
2600 North Central Avenue, Suite 1400
Phoenix, Arizona 85004

VIA ELECTRONIC FILING

Sara Demirok, Esq.
National Labor Relations Board, Region 28
Resident Office
2600 North Central Avenue, Suite 1400
Phoenix, Arizona 85004

VIA ELECTRONIC FILING

Mara-Louise Anzalone, Esq.
Administrative Law Judge
NLRB Division of Judges San Francisco Branch
901 Market Street, Suite 300
San Francisco, California 94103

VIA ELECTRONIC FILING

Caren P. Sencer, Esq.
Lisl Soto, Esq.
Caroline N. Cohen, Esq.
Weinberg, Roger & Rosenfeld
1001 Marina Village Parkway
Alameda, California 94501

VIA E-MAIL TO:
csencer@unioncounsel.net
lsoto@unioncounsel.net
ccohen@unioncounsel.net

Scott A. Wilson, Esq.
Law Offices of Scott A. Wilson
433 G Street, Suite 203
San Diego, California 92101

VIA CERTIFIED MAIL WITH RETURN RECEIPT

By: _____
An Employee of Kamer Zucker Abbott