

**UNITED STATES OF AMERICA
BEFORE THE NATIONAL LABOR RELATIONS BOARD
REGION 6**

PG PUBLISHING CO., INC. D/B/A
PITTSBURGH POST-GAZETTE

and

Case 06-CA-212627

THE NEWSPAPER GUILD OF
PITTSBURGH A/W COMMUNICATIONS
WORKERS OF AMERICA, AFL-CIO, CLC,
AND ITS LOCAL 38061

PITTSBURGH MAILERS UNION NO. M-
22, A/W THE PRINTING, PUBLISHING,
AND MEDIA WORKERS SECTOR OF
THE COMMUNICATIONS WORKERS OF
AMERICA, AFL-CIO, AND ITS LOCAL
14842

Case 06-CA-217525

PITTSBURGH TYPOGRAPHICAL UNION
NO. 7, A/W THE COMMUNICATIONS
WORKERS OF AMERICA, AFL-CIO, AND
ITS LOCAL 14827

Case 06-CA-217527

PITTSBURGH TYPOGRAPHICAL UNION
NO. 7, A/W THE COMMUNICATIONS
WORKERS OF AMERICA, AFL-CIO, AND
ITS LOCAL 14827

Case 06-CA-217529

NEWSPAPER, NEWSPRINT, MAGAZINE
AND FILM DELIVERY DRIVERS,
HELPERS AND HANDLERS, A/W THE
INTERNATIONAL BROTHERHOOD OF
TEAMSTERS AND ITS LOCAL UNION
NO. 211 OF ALLEGHENY COUNTY

Case 06-CA-217980

PITTSBURGH NEWSPAPER PRINTING
PRESSMEN'S/PAPER HANDLERS
LOCAL UNION NO. 9N, A/W THE
GRAPHIC COMMUNICATIONS
CONFERENCE/INTERNATIONAL
BROTHERHOOD OF TEAMSTERS AND
ITS LOCAL 24M/9N

Case 06-CA-218637, and

INTERNATIONAL UNION OF
OPERATING ENGINEERS, AFL-CIO,
LOCAL 95

Case 06-CA-220480

COUNSEL FOR THE CHARGING PARTIES ANSWERING BRIEF

ARGUMENT

The seven Charging Parties adopt the facts and arguments set forth in General Counsel's Answering Brief in support of the finding that the Respondent's conduct amounted to a violation of 8(a)(1) and (5) of the Act and that the Administrative Law Judge, David Goldman's decision is consistent with Extant Board law. In addition, the Charging Parties are compelled to comment on the exceptional work of the General Counsel's attempt to decipher exactly what the Respondent's position is in "Respondent's Exceptions and Brief in Support Thereof." Respondent's exceptions are a rambling hodge-podge of comments devoid of any statements in support or indication as to what the grounds are for such Exceptions. The Respondent's complete and utter failure follow the Board requirements are so woefully deficient procedurally that their Exceptions should be summarily dismissed. The specificity required by the Board's Rules and Regulations is totally lacking in the Respondent's Exceptions and Brief in Support. The requirements of Section 102.46(a)(1) of the Board's Rules and Regulations are completely ignored leaving the Charging Parties and the General Counsel in a quandary as to exactly what it is that the Respondent is objecting to and/or its support of those Exceptions. Specifically as Counsel for General Counsel eloquently pointed out:

“Without specific references to each exception in the Respondent's Brief in Support of Exceptions, as required by the Rules and Regulations, Counsel for the General Counsel is left to speculate about the Respondent's arguments and guess at appropriate responses to the Respondent's exceptions. In order for Counsel for the General Counsel to meaningfully “answer” the Respondent's exceptions, the Respondent should first present its exceptions and arguments in a manner which provides a clear roadmap. Due to the prejudiced position in which Counsel for the General Counsel currently finds himself, it is respectfully requested that the Board deny the Respondent's Exceptions in their

entirety, as its Brief in Support of Exceptions does not comport with the Board's Rules and Regulations." Counsel for the General Counsel's Answering Brief, pp. 8-9

Counsel for the Charging Parties in adopting all of the Counsel for the General Counsel's arguments proffered in its Answering Brief is nevertheless compelled to reemphasize the General Counsel's position that inasmuch as the Exceptions are inconsistent with the Board's Rules and Regulations all of the Exceptions be dismissed on this basis alone.

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Dated: November 27, 2018

CERTIFICATE OF SERVICE

I certify that a copy of the Counsel for the Charging Parties Answering Brief was served 27th day of November, 2018, to the parties listed below by e-mail only:

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