

**UNITED STATES OF AMERICA
BEFORE THE NATIONAL LABOR RELATIONS BOARD
REGION 7**

SPECTRUM JUVENILE JUSTICE SERVICES

Respondent

and

CASE 07-CA-199731
07-CA-208944

INTERNATIONAL UNION, SECURITY POLICE,
AND FIRE PROFESSIONALS OF AMERICA
(SPFPA)

Charging Party SPFPA

And

LOCAL 120, INTERNATIONAL UNION, SECURITY,
POLICE AND FIRE PROFESSIONALS OF AMERICA
(SPFPA)

Charging Party Local 120

RESPONDENT'S MOTION FOR SUMMARY JUDGMENT

Pursuant to National Labor Relations Board ("NLRB" or "Board") Rule and Regulation 102.24(b), Spectrum Juvenile Justice Services ("Respondent" or "SJS"), moves the Board for summary judgment on the Region 7 Director's Complaint. A memorandum of law and supporting evidence is attached to this motion.

Respectfully submitted,

BERRY MOORMAN P.C.

/s/ Sheryl L. Laughren

Sheryl L. Laughren (P34697)

Attorney for Respondent

535 Griswold, Suite 1900

Detroit, MI 48226

(313) 496-1200

slaughren@berrymoorman.com

Date: December 10, 2018