

**UNITED STATES OF AMERICA
BEFORE THE NATIONAL LABOR RELATIONS BOARD
REGION 32**

EVERPORT TERMINAL SERVICES INC.

and

INTERNATIONAL ASSOCIATION OF MACHINISTS
& AEROSPACE WORKERS, DISTRICT LODGE 190,
LOCAL LODGE 1546, AFL-CIO; AND
INTERNATIONAL ASSOCIATION OF MACHINISTS
AND AEROSPACE WORKERS, DISTRICT LODGE
190, LOCAL LODGE 1414, AFL-CIO

INTERNATIONAL LONGSHORE AND
WAREHOUSE UNION

and

INTERNATIONAL ASSOCIATION OF MACHINISTS
& AEROSPACE WORKERS, DISTRICT LODGE 190,
LOCAL LODGE 1546, AFL-CIO; AND
INTERNATIONAL ASSOCIATION OF MACHINISTS
AND AEROSPACE WORKERS, DISTRICT LODGE
190, LOCAL LODGE 1414, AFL-CIO

Case 32-CA-172286

Case 32-CB-172414

**REPLY TO CHARGING PARTY'S ANSWERING
BRIEF BY RESPONDENT EVERPORT TERMINAL
SERVICES INC.**

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EVERPORT TERMINAL SERVICES INC.

I. FOR ALL THE REASONS SET FORTH IN EVERPORT'S EXCEPTIONS AND SUPPORTING BRIEFS, THE BOARD SHOULD REJECT THE ALJ'S FINDINGS, RECOMMENDATIONS, AND PROPOSED ORDER

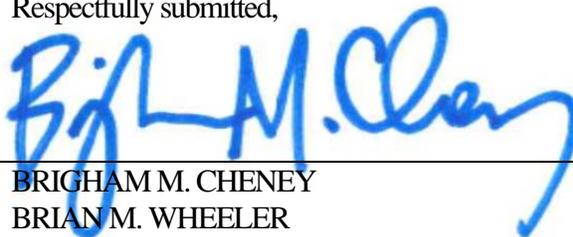
The bulk of the Charging Party's Answering Brief addresses the recommendation by the Administrative Law Judge ("ALJ") for a broad order against the International Longshore and Warehouse Union. This has no legal bearing on Respondent Everport Terminal Services Inc., as the ALJ did not recommend a broad order against Everport. The only portion of the brief relating to claims against Everport simply "adopt(s) and agree(s) with" the GC's Answering Brief. Accordingly, the Charging Party's claims pertaining to Everport should be rejected for all the same reasons set forth in Everport's Brief in Support of Exceptions and Reply to the GC's Answering Brief, the latter of which is filed concurrently with this reply brief.

II. CONCLUSION

For the reasons set forth in Everport's Exceptions, Brief in Support of Exceptions, and Reply to the General Counsel's Answering Brief, the Board should reject the ALJ's findings, recommendations, and proposed order in their entirety.

Date: January 23, 2019

Respectfully submitted,

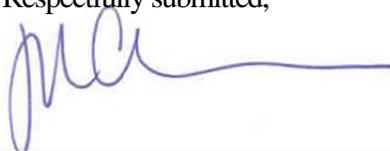


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Date: January 23, 2019

Respectfully submitted,



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CERTIFICATE OF SERVICE

[FRCP 5(B)]

STATE OF CALIFORNIA, COUNTY OF ORANGE

I am employed in the County of Orange, State of California. I am over the age of 18 years and am not a party to the within action; my business address is 20 Pacifica, Suite 1100, Irvine, California 92618.

On January 23, 2019, I served the following document(s) described as **REPLY TO CHARGING PARTY'S ANSWERING BRIEF BY RESPONDENT EVERPORT TERMINAL SERVICES INC.,** on the interested parties in this action as follows:

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- BY EMAIL: My electronic service address is DDunham@aalrr.com. Based on a written agreement of the parties pursuant to Fed. Rules Civ. Proc., Rule 5(b)(2)(E) to accept service by electronic means, I sent such document(s) to the email address(es) listed above or on the attached Service List. Such document(s) was scanned and emailed to such recipient(s) and email confirmation(s) will be maintained with the original document in this office indicating the recipients' email address(es) and time of receipt.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct, and that I am employed in the office of a member of the bar of this court at whose direction the service was made.

Executed on January 23, 2019, at Irvine, California.



Donna L. Dunham