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Attorneys for Charging Party INTERNATIONAL ASSOCIATION
OF MACHINISTS AND AEROSPACE WORKERS, LOCAL
LODGE 2949, AFL-CIO

UNITED STATES OF AMERICA
NATIONAL LABOR RELATIONS BOARD
REGION 28

PAE AVIATION AND TECHNICAL
SERVICES, LLC,

Respondent,

and

INTERNATIONAL ASSOCIATION OF
MACHINISTS AND AEROSPACE
WORKERS, LOCAL LODGE 2949, AFL-CIO,

Charging Party.

Cases 28-CA-170401
28-CA-175936

**OPPOSITION TO MOTION TO
WITHDRAW ALLEGATIONS AND
FOR REMAND**

Counsel for General Counsel filed a motion to withdraw certain allegations of the Complaint. No Order to Show Cause has been issued.

Charging Party requests that the Administrative Law Judge set a date, if necessary, for response to the Order to Show Cause.

The Charging Party will oppose the motion on the ground that the record demonstrates that there is no business justification.

Moreover, the Board's Order did not contemplate or allow the withdrawal of any allegation. The Board's Order limited further proceedings as stated in its Order "for the purpose of reopening the record, if necessary, and the preparation of a supplemental decision addressing

complaint allegations effected by *Boeing* and setting forth credibility resolutions” The Order did not contemplate the withdrawal of any such allegations, but rather at least an appropriate and complete record.

For these reasons, the Administrative Law Judge should not change the hearing date set for February 26, 2019. In the alternative, if the Administrative Law Judge wishes to have argument, the Administrative Law Judge should issue an appropriate Order to Show Cause.

The Charging Party opposes the Motion.

Dated: February 4, 2019

WEINBERG, ROGER & ROSENFELD
A Professional Corporation

By: /s/ David A. Rosenfeld
 DAVID A. ROSENFELD

Attorneys for Charging Party INTERNATIONAL
ASSOCIATION OF MACHINISTS AND
AEROSPACE WORKERS, LOCAL LODGE
2949, AFL-CIO

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PROOF OF SERVICE

I am a citizen of the United States and resident of the State of California. I am employed in the County of Alameda, State of California, in the office of a member of the bar of this Court, at whose direction this service was made. I am over the age of eighteen years and not a party to the within action.

On February 4, 2019, I served the following documents in the manner described below:

OPPOSITION TO MOTION TO WITHDRAW ALLEGATIONS AND FOR REMAND

- (BY ELECTRONIC SERVICE: By electronically mailing a true and correct copy through Weinberg, Roger & Rosenfeld’s electronic mail system from kkempler@unioncounsel.net to the email addresses set forth below.

On the following part(ies) in this action:

E-Filing

Honora Ble Mara-Louise Anzalone
Administrative Law Judge
National Labor Relations Board
Division of Judges – San Francisco Branch
901 Market Street, Suite 300
San Francisco, CA 94103-1779

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Attorneys for National Labor Relations Board

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on February 4, 2019, at Alameda, California.

/s/ Karen Kempler
Karen Kempler