

**UNITED STATES OF AMERICA  
BEFORE THE NATIONAL LABOR RELATIONS BOARD  
REGION 1**

ST. LUKE'S HOSPITAL,

Respondent,

And

MASSACHUSETTS NURSES  
ASSOCIATION,

Petitioner.

Case No. 01-RC-230363

**EMPLOYER'S REQUEST FOR STAY OF CERTIFICATION**

Under section 102.67(c) of the Board's Rules and Regulations, and in light of its Request for Review filed contemporaneously herewith, St. Luke's Hospital (the "Hospital") respectfully requests that the Board stay the Regional Director's Certification of Representative in this case pending the Board's decision on the Request for Review, and any subsequent decision regarding the Massachusetts Nurses Association's (the "Union") petition and the Regional Director's decision, because of the complex nature of the case, and the impact the decision will have on the Hospital's continuing relationship with the Union on behalf of all production and maintenance employees.

The Board's amended rules specifically allow a request to stay "any action taken or directed by the regional director." The Hospital's Request for Review, which is being filed contemporaneously herewith, is fully incorporated into this request by reference as support for the need for such a stay.

Respectfully submitted,

/s/ Gregory A. Brown

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Dated: March 13, 2019

Attorneys for St. Luke's Hospital

**CERTIFICATE OF SERVICE**

I hereby certify that on this 13<sup>th</sup> day of March, 2019, I e-filed the foregoing Employer's Request for Stay of Certification on the NLRB's E-Filing system and served a copy of the document by electronic mail upon:

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/s/ Gregory A. Brown  
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