

**UNITED STATES OF AMERICA
BEFORE THE NATIONAL LABOR RELATIONS BOARD
REGION 28**

APEX LINEN SERVICE INC.

and

**Cases 28-CA-216351
28-CA-218085
28-CA-222251
28-CA-225805
28-CA-226407
28-CA-226917
28-CA-226924
28-CA-226939
28-CA-227970
28-CA-227973
28-CA-233003**

**INTERNATIONAL UNION OF OPERATING
ENGINEERS, LOCAL 501, AFL-CIO**

NOTICE OF INTENT TO FURTHER AMEND CONSOLIDATED COMPLAINT

PLEASE TAKE NOTICE that, at the start of hearing in the captioned matter on April 16, 2019, Counsel for the General Counsel will move to amend the Consolidated Complaint and Notice of Hearing issued on February 8, 2019, as amended on March 29, 2019, as follows:

Substitute the following for Paragraphs 8(e), 8(f) and 12:

8. (e) The subjects set forth above in paragraph 6(n) and 8(d) relate to wages, hours, and other terms and conditions of employment of the Unit and are mandatory subjects for the purposes of collective bargaining.

8. (f) Respondent engaged in the conduct described above in paragraphs 6(n) and 8(d) without prior notice to the Union and without affording the Union an opportunity to bargain with Respondent to an overall good-faith impasse.

12. By the conduct described above in paragraphs 6(n) and 8(d) through 8(u), Respondent has been discriminating against employees in violation of Sections 8(a)(1) and (5) of the Act.

Dated at Las Vegas, Nevada, this 10th day of April 2019.

/s/ Nathan A. Higley

Nathan A. Higley
Counsel for the General Counsel
National Labor Relations Board
Region 28 – Las Vegas Resident Office
Foley Federal Building
300 Las Vegas Boulevard South, Suite 2-901
Las Vegas, NV 89101
Telephone: (702) 820-7467
Facsimile: (702) 388-6248
E-Mail: Nathan.Higley@nlrb.gov

CERTIFICATE OF SERVICE

I hereby certify that the foregoing Notice of Intent to Further Amend Consolidated Complaint in Apex Linen Service, Inc., Cases 28-CA-216351, et al., was E-Filed and served by E-Mail, on this 10th day of April 2019, on the following:

Via E-Filing:

Honorable Gerald M. Etchingham
Associate Chief Administrative Law Judge
National Labor Relations Board—Division of Judges
901 Market Street, Suite 300
San Francisco, CA 94103-1779

Via Electronic Mail:

John Naylor, Attorney at Law
Andrew J. Sharples, Attorney at Law
Naylor & Braster, PLLC
1050 Indigo Drive, Suite 200
Las Vegas, NV 89145-8870
Email: asharples@naylorandbrasterlaw.com
jnaylor@naylorandbrasterlaw.com

Adam N. Stern, Attorney at Law
The Myers Law Group
9327 Fairway View Place, Suite 100
Rancho Cucamonga, CA 91730-0969
Email: laboradam@aol.com

/s/ Dawn M. Moore

Dawn M. Moore
Administrative Assistant
National Labor Relations Board
Region 28 - Las Vegas Resident Office
Foley Federal Building
300 Las Vegas Boulevard South, Suite 2-901
Las Vegas, Nevada 89101
Telephone: (702) 820-7466
Facsimile: (702) 388-6248
E-Mail: Dawn.Moore@nlrb.gov