

**UNITED STATES OF AMERICA
BEFORE THE NATIONAL LABOR RELATIONS BOARD
WASHINGTON D.C.**

AMR OF MARICOPA LLC
AMERICAN AMBULANCE SERVICE,
Employer

and

INDEPENDENT CERTIFIED EMERGENCY
PROFESSIONALS, NAGE/SEIU, LOCAL 1
Union,

and

AMERICAN FEDERATION OF STATE,
COUNTY AND MUNICIPAL EMPLOYEE,
LOCAL 2961, AFL-CIO
Union,

and

INTERNATIONAL ASSOCIATION OF
FIRE FIGHTERS LOCAL INDUSTRIAL 60
Union

Case No. 28-UC-233664

Director's Decision, Union, ICEP, opposes said Request for Review. Additionally, the Employer(s) has/have failed to state a compelling argument that a substantial question of law or policy resulted from the Regional Director's findings or conclusions. Rather, the Employer(s) simply reiterate(s) the same arguments made in the closing arguments of the underlying hearing. As such, Employer's(') Request for Review of the Decision does not satisfy the requirements of the National Labor Relations Board's Rule and Regulations, Section 102.67(d) (d) and (e).

Respectfully submitted,

/s/ Kathleen Sage

Assistant General Counsel.
NAGE/IAEP/ICEP
1819 Knoll Drive #1
Ventura, CA 93003

Dated: April 23, 2018

CERTIFICATE OF SERVICE

I, Kathleen Sage, Esq., hereby certify that on April 23, 2018, a true and correct copy of the enclosed UNION'S STATEMENT IN OPPOSITION TO EMPLOYER'S PETITION FOR REVIEW was served, via Electronic mail only:

Cornele A. Overstreet
Judith E. Davila
Field Attorney
National Labor Relations Board
2600 North Central Avenue
Suite 1400.
Phoenix, AZ.
Email Cornele.Overstreet@nrlb.gov
Judith.Davila@nrlb.gov

Regional Director for Region 28

Jennifer Kroll, Esq.
Martin & Bonnett, PLLC
4647 North 32nd Street, Suite 185
Phoenix, Arizona 85018
Email jkroll@martinbonnett.com

Counsel for AFSCME

Stanley Lubin, Attorney at Law
Lubin & Enoch, P.C,
349 North Fourth Avenue
Phoenix, AZ 85003
Email stan@lubinandenoch.com

Counsel for IAFF

Kevin Burkhart, President
International Association of Fire Fighters Local
Industrial 60(IAFF I-60)
60 Rio Saldo Pkwy
Suite 900
Tempe, AZ 85281
Email: Kevin.burkhart@locali60.org

American Federation of State, County &
Municipal Employees, Local 2960
2960 N. 16th Street, Phoenix, AZ 85106-7606
Email: officers@afscme2960.org

Dan Fears
4 Park Plaza, Suite 1100
Irvine, CA 92614
Email dff@paynefears.com

Counsel for Employer(s)

/s/ Kathleen Sage

Kathleen Sage.