

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

**VOLKSWAGEN GROUP OF AMERICA  
CHATTANOOGA OPERATIONS, LLC**

**Employer**

**and**

**Case No. 10-RC-239234**

**INTERNATIONAL UNION, UNITED  
AUTOMOBILE, AEROSPACE AND  
AGRICULTURAL IMPLEMENT WORKERS  
(UAW),**

**Petitioner**

**VOLKSWAGEN’S RESPONSE TO INTERNATIONAL’S MOTION TO LIFT STAY**

Volkswagen Group of America Chattanooga Operations, LLC (“Volkswagen” or “Company”) files this Response to the International Union, United Automobile, Aerospace and Agricultural Implement Workers of America’s (the “International”) Motion to Lift Stay. Volkswagen reasserts its position relating to the status of the certification bar at the time the petition was filed, as stated in its Request for Review of Regional Director’s Order and Motion to Stay All Proceedings, filed April 17, 2019.

Respectfully submitted,

LITTLER MENDELSON, P.C.

Dated this 15th day of May, 2019.

/s/ Arthur T. Carter

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## CERTIFICATE OF SERVICE

I hereby certify that a complete copy of *Volkswagen's Response to Union's Motion to Lift Stay* was e-filed with the NLRB on May 15th, 2019, was also served on the following persons by electronic filing and/or email on May 15th, 2019:

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*/s/ Arthur T. Carter*  
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