

**UNITED STATES OF AMERICA
BEFORE THE NATIONAL LABOR RELATIONS BOARD
REGION 10**

KUMHO TIRES GEORGIA,)	
)	
Respondent/Employer)	
)	
and)	Case 10-CA-208255
)	Case 10-CA-208414
UNITED STEEL, PAPER & FORESTRY)	Case 10-RC-206308
RUBBER, MANUFACTURING, ENERGY)	
ALLIED INDUSTRIAL & SERVICE)	
WORKERS INTERNATIONAL UNION)	
AFL-CIO, CLC)	
Charging Party/Petitioner)	

MOTION FOR RECONSIDERATION

NOW COMES Kumho Tires Georgia, Respondent herein, and files its Motion for Reconsideration of the Board’s Decision granting Counsel for the General Counsel Motion to Sever and Remand Case 10-RC-206308 dated August 5, 2019.

The Respondent did oppose the Union’s Request for Withdrawal and this was not accurately reported by the Counsel for the General Counsel. The Counsel for the General Counsel was notified of this incorrect statement of the facts, but did not notify the Board.

Accordingly, the Respondent requests reconsideration based on this inaccurate reporting of the facts by the Counsel for the General Counsel to the Board as reflected in Respondent’s Motion to Correct the Record Concerning the Respondent’s Position on Counsel for the General Counsel’s Motion to Sever and Remand Case 10-RC-206308 dated July 29, 2019. (Exhibit “A”). Therefore, we ask the Executive Secretary to reconsider its granting of the Counsel for the General Counsel’s Motion to Sever and Remand Case 10-RC-206308 which was dated July 25, 2019.

SIGNATURES ON FOLLOWING PAGE

Respectfully submitted this 5th day of August 2019.

/s/ W. Melvin Haas, III
W. Melvin Haas, III
W. Jonathan Martin, II

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CERTIFICATE OF SERVICE

I hereby certify that on this day, I served the forgoing MOTION FOR RECONSIDERATION by electronic mail on the following parties:

United Steel, Paper and Forestry, Rubber, Manufacturing, Energy Allied Industrial and Service Workers International Union Keren Wheeler 60 Boulevard of Allies Suite 807 Pittsburg, PA 15222 kwheeler@usw.org	Kami Kimber Field Attorney Region 10 National Labor Relations Board 233 Peachtree Street, NE 1000 Harris Tower Atlanta, GA 30303 Kami.Kimber@nlrb.gov
Richard P. Rouco, Esq. Quinn, Connor, Weaver, Davis & Rouco, LLP 2-20 th Street North , Suite 930 Birmingham, AL 35203 rrouco@qcwdr.com	Matthew Turner Field Attorney National Labor Relations Board, Region 10 233 Peachtree Street NE Suite 1000, Atlanta, GA 30303 Matthew.Turner@nlrb.gov

Dated this 5th day of August, 2019.

/s/ W. Melvin Haas, III

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EXHIBIT "A"

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AFL-CIO, CLC)	
Charging Party/Petitioner)	
)	

**MOTION TO CORRECT THE RECORD CONCERNING THE RESPONDENT'S
POSITION ON COUNSEL FOR THE GENERAL COUNSEL'S MOTION TO SEVER
AND REMAND CASE 10-RC-206308**

NOW COMES Kumho Tires Georgia, Respondent herein, and files its Motion to Correct the Record Concerning the Respondent's Position on Counsel for the General Counsel's Motion to Sever and Remand Case 10-RC-206308 dated July 25, 2019.

The Respondent opposes the Counsel for the General Counsel Motion to Sever and Remand Case 10-RC-206308 ("Motion to Sever") to the extent that any of the allegations in the prior C cases can be used in any subsequent R case, and any objections in any prior R cases can be used in any subsequent R cases, and there cannot be any reference to any prior C cases for background or other purposes. This opposition was shared with the Board attorney when requested for our position and Respondent hereby clarifies the record because it was not specifically alluded to in the Region's report.

Respectfully submitted this 29th day of July 2019.

/s/ W. Melvin Haas, III
W. Melvin Haas, III
W. Jonathan Martin, II

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CERTIFICATE OF SERVICE

I hereby certify that on this day, I served the forgoing MOTION TO CORRECT THE RECORD WITH REGARD TO THE RESPONDENT'S POSITION ON COUNSEL FOR THE GENERAL COUNSEL'S MOTION TO SEVER AND REMAND CASE 10-RC-206308 by electronic mail on the following parties:

United Steel, Paper and Forestry, Rubber, Manufacturing, Energy Allied Industrial and Service Workers International Union Keren Wheeler 60 Boulevard of Allies Suite 807 Pittsburg, PA 15222 kwheeler@usw.org	Kami Kimber Field Attorney Region 10 National Labor Relations Board 233 Peachtree Street, NE 1000 Harris Tower Atlanta, GA 30303 Kami.Kimber@nlrb.gov
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Dated this 29th day of July, 2019.

/s/ W. Melvin Haas, III

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