



UNITED STATES GOVERNMENT
NATIONAL LABOR RELATIONS BOARD

SUBREGION 11
4035 University Pkwy Ste 200
Winston Salem, NC 27106-3275

Agency Website: www.nlr.gov
Telephone: (336)631-5201
Fax: (336)631-5210

Agent's Direct Dial: (336) 582-7145

August 22, 2019

Roxanne L. Rothschild, Executive Secretary
Office of the Executive Secretary
National Labor Relations Board
1015 Half Street SE
Washington, D.C. 20570-0001

VIA E-FILE

Re: American Postal Workers Union, AFL-
CIO, Local 1901
Case 10-CB-231385

Dear Ms. Rothschild:

I have e-filed with your office Counsel for General Counsel's Motion to Transfer Case to the Board and for Default Judgment in this case.

I have today caused a copy of these documents to be served by U.S. mail on the parties identified below.

Sincerely,

A handwritten signature in black ink, appearing to read "Jordan N. Wolfe".

Jordan N. Wolfe
Counsel for General Counsel

John Harris, President
American Postal Workers Union Local 1901
201 Piedmont Street
Reidsville, NC 27320

American Postal Workers Union, AFL-CIO, - 2 -
Local 1901
Case 10-CB-231385

August 22, 2019

John Harris, President
American Postal Workers Union Local 1901
PO Box 104
Reidsville, NC 27320

Anthoula Contogiannis
5022 US Highway 220 N
Summerfield, NC 27358-9761

Roderick D. Eves, Deputy Managing Counsel
United States Postal Service
1720 Market St. Rm 2400, Law Department - NLRB Unit
Saint Louis, MO 63155-9948

**UNITED STATES OF AMERICA
BEFORE THE NATIONAL LABOR RELATIONS BOARD
REGION 10, SUBREGION 11**

**AMERICAN POSTAL WORKERS UNION, AFL –
CIO, LOCAL 1901 (UNITED STATES POSTAL
SERVICE)**

and

Case 10–CB–231385

ANTHOULA CONTOGIANNIS, an Individual

**COUNSEL FOR GENERAL COUNSEL’S MOTION TO TRANSFER CASE TO THE
BOARD AND FOR DEFAULT JUDGMENT**

Pursuant to Sections 102.24 and 102.50 of the National Labor Relations Board Rules and Regulations, Counsel for General Counsel respectfully moves that the National Labor Relations Board: (1) transfer this case and continue the proceedings before the Board; (2) deem the allegations set forth in the Complaint and Notice of Hearing issued July 8, 2019, and as amended on August 20, 2019, as admitted to be true without taking evidence supporting the Complaint allegations; and (3) grant Default Judgment and issue a Decision and Order on the basis of the following:

1.

Anthoula Contogiannis filed the charge in this proceeding on November 20, 2018, and a copy was served on Respondent by U.S. mail on the same date. A copy of the charge and the Regional Director’s letter of transmittal of the charge, together with the Affidavit of Service, are attached as Exhibits 1 and 2, respectively.

2.

On June 17, 2019, the Acting Regional Director for Region 10 issued, and served, by certified mail, the Complaint in Case 10-CB-231385 alleging that Respondent violated Section

8(b)(1)(A) of the Act by failing to process a grievance that Unit employee Anthoula Contogiannis filed or attempted to file under the provisions of the collective-bargaining agreement, regarding her notice of removal and discharge from the Postal Service, failing to provide Anthoula Contogiannis with a copy of her grievance, and failing to keep Anthoula Contogiannis informed as to the status of her grievance. The Region served the Complaint to Respondent at its address at 201 Piedmont Street, Reidsville, North Carolina 27320, which is also the address for the only Post Office in Reidsville, North Carolina. A signed green card showing receipt of the Complaint by Respondent was not returned, and the tracking shows that the Complaint was delivered to the address on June 19, 2019 and was available for pickup. A copy of the Complaint and the Affidavit of Service (including the tracking information and status), are attached as Exhibits 3 and 4, respectively.

3.

On July 8, 2019, the Regional Director for Region 10 reissued, and served, by certified mail, the same Complaint in Case 10-CB-231385. The Region served the reissued Complaint to Respondent's 201 Piedmont Street address, and to an additional address: PO Box 104, Reidsville, North Carolina 27320. This Post Office box is located at the Reidsville Post Office at 201 Piedmont Street in Reidsville, North Carolina, and was confirmed by the American Postal Workers National Union to be correct. A signed green card showing receipt of the Complaint by Respondent was not returned, and the tracking shows that the Complaint was delivered to both addresses on July 10, 2019 and was available for pickup. Copies of the reissued Complaint and the Affidavit of Service (including the tracking information and status), are attached as Exhibits 5 and 6, respectively.

4.

The Complaint states, in pertinent part, that, pursuant to Sections 102.20 and 102.21 of the Board's Rules, Respondent shall file an Answer to the Complaint to be received in the Winston-Salem Subregional Office by close of business on July 22, 2019, or postmarked on or before July 21, 2019, and that, absent such action, all of the Complaint allegations shall be deemed to be true and shall be so found by the Board.

5.

By letter dated July 23, 2019, sent by U.S. mail to the 201 Piedmont Street and PO Box 104 addresses, referenced above in paragraphs 2 and 3, the Officer-in-Charge for Region 10, Subregion 11, advised Respondent that, absent receipt of an Answer to the July 8, 2019, Complaint in the Winston-Salem Subregional Office by close of business on July 29, 2019, Counsel for General Counsel would file a Motion for Default Judgment. Copies of the letter sent to each address are attached as Exhibits 7 and 8, respectively. By letter dated July 25, 2019, sent by U.S. mail to the 201 Piedmont Street and PO Box 104 addresses, the Officer-in-Charge for Region 10, Subregion 11, corrected the date that the Answer was due to the Subregional Office to July 30, 2019, rather than July 29, 2019. Copies of the letter sent to each address are attached as Exhibits 9 and 10, respectively.

6.

On August 2, 2019, Counsel for General Counsel served a copy of the Complaint on Respondent, through its agent, President John Harris, in person, at the 201 Piedmont Street address, where President Harris works. A copy of the Affidavit of Service is attached as Exhibit 11.

7.

By letter dated August 8, 2019, sent by U.S. mail to the 201 Piedmont Street and PO Box 104 addresses,¹ Counsel for General Counsel advised Respondent that, absent receipt of an Answer by close of business on August 16, 2019, Counsel for General Counsel would file a Motion for Default Judgment. Counsel for General Counsel also enclosed a copy of a sample Answer, as well as a copy of the July 8, 2019 Complaint. A copy of the letter is attached as Exhibit 12.

8.

On August 20, 2019, the Acting Regional Director for Region 10, issued and served, by certified mail, an Amendment to Complaint, withdrawing the allegation that Respondent violated Section 8(b)(1)(A) of the Act by refusing to provide Unit employee Anthoula Contogiannis with a copy of her grievance. The amendment did not require an Answer, as the only substantive amendment was to withdraw allegations. Copies of the Amendment to Complaint and the Affidavit of Service, are attached as Exhibits 13 and 14, respectively.

9.

As shown above, except for the initial Complaint that issued on June 17, 2019, the subsequent Complaint reissued on July 8, 2019, and all additional letters to the Union, were all delivered at both the 201 Piedmont Street and the PO Box 104 addresses. Respondent's actual receipt on August 2, 2019, of the Complaint, Exhibit 11, establishes the validity of the 201 Piedmont Street address. Further, none of the letters sent to Respondent's 201 Piedmont Street address or its PO Box 104 address have been returned by the U.S. Postal Service as refused, undeliverable, or otherwise unclaimed. The failure of the Postal Service to return these letters to

¹ Counsel for General Counsel also sent the letter to a third address for Respondent which the Region obtained through CLEAR online investigation software, but the letter was returned as "Insufficient Address—Unable to Forward."

the Region indicates that Respondent received them. See *Cherry Auto Parts, Inc.*, 354 NLRB No.10, slip op. at 1 fn. 2 (2009); *National Specialties Installations, Inc.*, 350 NLRB No. 79, slip op. at 1 fn. 3 (2007) (unpublished summary disposition); *Lite Flight, Inc.* 285 NLRB 649, 650 (1987), *enfd. sub nom. NLRB v. Sherman*, 843 F.2d 1392 (6th Cir. 1988) (unpublished). Additionally, the Complaints sent via certified mail were unclaimed and “[it] is well settled that a respondent’s failure or refusal to accept certified mail or to provide for appropriate service cannot serve to defeat the purposes of the Act.” *Cherry Auto Parts, Inc.*, 354 NLRB No.10, slip op. at 1 fn. 2 (2009); *National Specialties Installations, Inc.*, 350 NLRB No. 79, slip op. at 1 fn. 3 (2007) (unpublished summary disposition). In any event, there is no question that the Region served Respondent with the July 8, 2019, Complaint in person, through its agent, President John Harris, on August 2, 2019.

10.

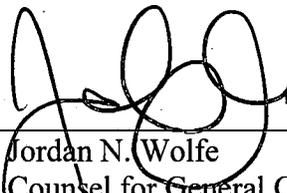
To date, Respondent has failed to file an Answer. Because no Answer has been filed to the Complaint, and no good cause has been claimed or shown, all of the Complaint allegations should be deemed to be admitted and found to be true. *Thoele Asphalt Paving, Inc.*, 354 NLRB No. 69, slip op. at 1-2 (2009); *Dodge Printing, LLC*, 354 NLRB No. 67, slip op. at 1 (2009); *Buggy Whip*, 356 NLRB No. 80, slip op. at 1 (2011) (Motion for Default Judgment granted “[i]n the absence of good cause being shown for the failure to file an answer”).

11.

WHEREFORE, Counsel for General Counsel respectfully requests, in accordance with Sections 102.24 and 102.50 of the Board's Rules, that the Board deem all matters alleged in the Complaint to be true, and that they be so found, and that a Decision and Order be issued

containing findings of fact, conclusions of law, and an appropriate remedy for the violations stated herein.

Dated: August 22, 2019



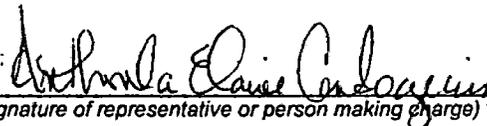
Jordan N. Wolfe
Counsel for General Counsel
National Labor Relations Board
Subregion 11
4035 University Pkwy Ste 200
Winston Salem, NC 27106-3275

Attachments

EXHIBIT 1

UNITED STATES OF AMERICA		DO NOT WRITE IN THIS SPACE	
NATIONAL LABOR RELATIONS BOARD		Case	Date filed
CHARGE AGAINST LABOR ORGANIZATION OR ITS AGENTS		10-CB-231385	11/20/18
INSTRUCTIONS: File an original of this charge with the NLRB Regional Director of the region in which the alleged unfair labor practice occurred or is occurring.			
1. LABOR ORGANIZATION OR ITS AGENTS AGAINST WHICH CHARGE IS BROUGHT			
a. Name American Postal Workers Union Local 1901		b. Union Representative to Contact John Harris, President	
c. Address 201 Piedmont St, Reidsville, NC 27320-3869		d. Tel. No. (336)423-2056	e.e. Cell No.
		f. Fax No.	g. e-Mail
h. The above-named labor organization or its agents have engaged in and are engaging in unfair labor practices within the meaning of section 8(b), subsection(s) (1)(A) of the National Labor Relations Act, and these unfair labor practices are unfair practices affecting commerce within the meaning of the Act, or are unfair practices affecting commerce within the meaning of the Act and the Postal Reorganization Act.			
2. Basis of the Charge (set forth a clear and concise statement of the facts constituting the alleged unfair labor practices)			
During the past six months, the above-named labor organization has restrained and coerced employees in the exercise of rights protected by Section 7 of the Act by failing or refusing to process the grievance of Anthoula Contogiannis regarding the Postal Service refusing to provide light duty accommodations for arbitrary or discriminatory reasons or in bad faith.			
During the past six months, the above-named labor organization has restrained and coerced employees in the exercise of rights protected by Section 7 of the Act by failing or refusing to process the grievance of Anthoula Contogiannis regarding her Notice of Removal for arbitrary or discriminatory reasons or in bad faith.			
During the past six months, the above-named labor organization has restrained and coerced employees in the exercise of rights protected by Section 7 of the Act by refusing to provide Anthoula Contogiannis with a copy of the grievances and any information about the Postal Service's discharge and discipline that she requested.			

3. Name of Employer United States Postal Service		4a. Tel. No.	4b. Cell No.
		4c. Fax No.	4d. e-Mail
5. Location of Plant involved (street, city, state, and ZIP code) 201 Piedmont St, Reidsville, NC 27320-3869		6. Employer representative to contact Amanda Hodges Officer in Charge	
7. Type of Establishment (factory, mine, wholesaler) Post Office	8. Principal product or service U.S. Mail	9. Number of Workers employed 30	
10. Full name of party filing charge Anthoula Contogiannis		11a. Tel. No. (336)601-0012	11b. Cell No.
		11c. Fax No.	11d e-Mail aecontogiannis@gmail.com
11. Address of party filing charge (street, city, state, and ZIP code) 5022 US Highway 220 N, Summerfield, NC 27358-9761			

12. DECLARATION		
I declare that I have read the above charge and that the statements therein are true to the best of my knowledge and belief.		
By:  (signature of representative or person making charge)	Anthoula Contogiannis Print/type name and title or office, if any	Tel No. (336)601-0012
Address: 5022 US Highway 220 N, Summerfield, NC 27358-9761		Cell No.
Date: 11-20-2018		Fax No.
		e-Mail aecontogiannis@gmail.com

WILLFUL FALSE STATEMENTS ON THIS CHARGE CAN BE PUNISHED BY FINE AND IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001) PRIVACY ACT STATEMENT

Solicitation of the information on this form is authorized by the National Labor Relations Act (NLRA), 29 U.S.C. § 151 *et seq.* The principal use of the information is to assist the National Labor Relations Board (NLRB) in processing unfair labor practice and related proceedings or litigation. The routine uses for the information are fully set forth in the Federal Register, 71 Fed. Reg. 74942-43 (Dec. 13, 2006). The NLRB will further explain these uses upon request. Disclosure of this information to the NLRB is voluntary; however, failure to supply the information will cause the NLRB to decline to invoke its processes.

EXHIBIT 2



UNITED STATES GOVERNMENT
NATIONAL LABOR RELATIONS BOARD

SUBREGION 11
4035 University Pkwy Ste 200
Winston Salem, NC 27106-3275

Agency Website: www.nlr.gov
Telephone: (336)631-5201
Fax: (336)631-5210



Download
NLRB
Mobile App

November 20, 2018

John Harris, President
American Postal Workers Union Local 1901
201 Piedmont St
Reidsville, NC 27320-3869

Re: American Postal Workers Union Local 1901
(United States Postal Service)
Case 10-CB-231385

Dear Mr. Harris:

Enclosed is a copy of a charge that has been filed in this case. This letter tells you how to contact the Board agent who will be investigating the charge, explains your right to be represented, discusses presenting your evidence, and provides a brief explanation of our procedures, including how to submit documents to the NLRB.

Investigator: This charge is being investigated by Field Attorney ASHLEY L. BANKS whose telephone number is (336)582-7126. If this Board agent is not available, you may contact Supervisory Attorney SHANNON R. MEARES whose telephone number is (336)582-7137.

Right to Representation: You have the right to be represented by an attorney or other representative in any proceeding before us. If you choose to be represented, your representative must notify us in writing of this fact as soon as possible by completing Form NLRB-4701, Notice of Appearance. This form is available on our website, www.nlr.gov, or from an NLRB office upon your request.

If you are contacted by someone about representing you in this case, please be assured that no organization or person seeking your business has any "inside knowledge" or favored relationship with the National Labor Relations Board. Their knowledge regarding this proceeding was only obtained through access to information that must be made available to any member of the public under the Freedom of Information Act.

Presentation of Your Evidence: We seek prompt resolutions of labor disputes. Therefore, I urge you or your representative to submit a complete written account of the facts and a statement of your position with respect to the allegations set forth in the charge as soon as possible. If the Board agent later asks for more evidence, I strongly urge you or your representative to cooperate fully by promptly presenting all evidence relevant to the investigation. In this way, the case can be fully investigated more quickly.

Full and complete cooperation includes providing witnesses to give sworn affidavits to a Board agent, and providing all relevant documentary evidence requested by the Board agent.

November 20, 2018

Sending us your written account of the facts and a statement of your position is not enough to be considered full and complete cooperation. A refusal to fully cooperate during the investigation might cause a case to be litigated unnecessarily.

We will not honor any request to place limitations on our use of position statements or evidence beyond those prescribed by the Freedom of Information Act and the Federal Records Act. Thus, we will not honor any claim of confidentiality except as provided by Exemption 4 of FOIA, 5 U.S.C. Sec. 552(b)(4), and any material you submit may be introduced as evidence at any hearing before an administrative law judge. We are also required by the Federal Records Act to keep copies of documents gathered in our investigation for some years after a case closes. Further, the Freedom of Information Act may require that we disclose such records in closed cases upon request, unless there is an applicable exemption. Examples of those exemptions are those that protect confidential financial information or personal privacy interests.

Procedures: We strongly urge everyone to submit all documents and other materials by E-Filing (not e-mailing) through our website, www.nlr.gov. However, the Agency will continue to accept timely filed paper documents. Please include the case name and number indicated above on all your correspondence regarding the charge.

Information about the Agency, the procedures we follow in unfair labor practice cases and our customer service standards is available on our website, www.nlr.gov or from an NLRB office upon your request. NLRB Form 4541 offers information that is helpful to parties involved in an investigation of an unfair labor practice charge.

We can provide assistance for persons with limited English proficiency or disability. Please let us know if you or any of your witnesses would like such assistance.

Very truly yours,

John D. Doyle, Jr.
Regional Director

By:



Scott C. Thompson
Officer in Charge

Enclosure: Copy of Charge

UNITED STATES OF AMERICA
BEFORE THE NATIONAL LABOR RELATIONS BOARD

**AMERICAN POSTAL WORKERS UNION
LOCAL 1901 (UNITED STATES POSTAL
SERVICE)**

Charged Party

and

ANTHOULA CONTOGIANNIS

Charging Party

Case 10-CB-231385

AFFIDAVIT OF SERVICE OF CHARGE AGAINST LABOR ORGANIZATION

I, the undersigned employee of the National Labor Relations Board, state under oath that on November 20, 2018, I served the above-entitled document(s) by post-paid regular mail upon the following persons, addressed to them at the following addresses:

John Harris, President
American Postal Workers Union Local 1901
201 Piedmont St
Reidsville, NC 27320-3869

November 20, 2018

Date

Lauren Lewis, Designated Agent of NLRB

Name

/s/ Lauren Lewis

Signature

EXHIBIT 3

**UNITED STATES OF AMERICA
BEFORE THE NATIONAL LABOR RELATIONS BOARD
REGION 10, SUBREGION 11**

**AMERICAN POSTAL WORKERS UNION, AFL –
CIO, LOCAL 1901 (UNITED STATES POSTAL
SERVICE)**

and

Case 10–CB–231385

ANTHOULA CONTOGIANNIS, an Individual

COMPLAINT AND NOTICE OF HEARING

This Complaint and Notice of Hearing is based on a charge filed by Anthoula Contogiannis, an individual. It is issued pursuant to Section 10(b) of the National Labor Relations Act, 29 U.S.C. § 151 et seq. (the Act), the Postal Reorganization Act, 39 U.S.C. § 101 et seq. (PRA), and Section 102.15 of the Rules and Regulations of the National Labor Relations Board (the Board) and alleges that American Postal Workers Union, AFL-CIO, Local 1901 (Respondent) has violated the Act as described below.

1.

Anthoula Contogiannis filed the charge in this proceeding on November 20, 2018, and a copy was served on Respondent by U.S. mail on the same date.

2.

The United States Postal Service (Postal Service) provides postal services for the United States and operates various facilities throughout the United States in performing that function, including its Post Office involved in this proceeding located at 201 Piedmont Street, Reidsville, North Carolina.

3.

The Board has jurisdiction over Respondent and this matter by virtue of Section 1209 of the PRA.

4.

(a) At all material times, Respondent has been a labor organization within the meaning of Section 2(5) of the Act.

(b) At all material times, American Postal Workers Union, AFL–CIO (the National Union) has been a labor organization within the meaning of Section 2(5) of the Act.

5.

At all material times, the following individuals held the positions set forth opposite their respective names and have been agents of Respondent within the meaning of Section 2(13) of the Act:

John Harris	—	President
Turnette Chestnut	—	Shop Steward

6.

At all material times, by virtue of Section 9(a) of the Act, the National Union has been the exclusive collective-bargaining representative of the following employees of the Postal Service (the Unit):

All employees in the bargaining unit for which each has been recognized and certified at the national level, including maintenance employees, motor vehicle employees, postal clerks, special delivery messengers, mail equipment shops employees, material distribution centers employees, and operating services and facilities services employees; and excluding managerial and supervisory personnel, professional employees, employees engaged in personnel work other than a purely non-confidential clerical capacity, security guards as defined in Public Law 91-375, 1201(2), all Postal Inspection Service employees, employees in the supplemental work forces

as defined in Article 7 of the Collective-Bargaining Agreement, rural letter carriers, mail handlers, and letter carriers.

7.

Since about July 20, 1971, and at all material times, the National Union has been the designated exclusive collective-bargaining representative of the Unit employed by the Postal Service and during that time, the National Union, and its affiliated locals on behalf of the National Union, including Respondent, have been recognized as such representative by the Postal Service.

8.

At all material times, the National Union and the Postal Service have maintained and enforced a collective-bargaining agreement covering the terms and conditions of employment of the Unit, including a grievance and arbitration procedure. That collective-bargaining agreement was effective on its face from May 21, 2015 through September 20, 2018. Prior to its expiration on September 20, 2018, the parties to the agreement extended the collective-bargaining agreement until agreement or interest arbitration on a successor contract.

9.

Since about September 11, 2018, Respondent has failed to process a grievance that Unit employee Anthoula Contogiannis filed or attempted to file under the provisions of the collective-bargaining agreement described above in paragraph 8, regarding her notice of removal and discharge from the Postal Service.

10.

On October 16, 2018, Anthoula Contogiannis requested in writing, via text message, that Respondent provide her with a copy of her grievance and the status of her grievance as described above in paragraph 9.

11.

Since September 11, 2018, Respondent has failed to keep Anthoula Contogiannis informed as to the status of her grievance as described above in paragraph 9.

12.

Since October 16, 2018, Respondent has failed and refused to provide Anthoula Contogiannis with a copy of her grievance and the status of her grievance as described above in paragraph 10.

13.

Respondent's conduct described above in paragraphs 9, 11, and 12 was arbitrary.

14.

By engaging in the conduct described above in paragraphs 9 and 11 through 13 in connection with its representative status described above in paragraphs 6 through 8, Respondent has failed to represent Anthoula Contogiannis for reasons that are arbitrary, discriminatory, or in bad faith and has breached the fiduciary duty it owes to this employee and to the Unit.

15.

By the conduct described above in paragraphs 9 and 11 through 14, Respondent has been restraining and coercing employees in the exercise of the rights guaranteed in Section 7 of the Act in violation of Section 8(b)(1)(A) of the Act and within the meaning of the PRA.

REMEDIES

As part of the remedy for the unfair labor practices alleged above in paragraphs 9 and 11 through 15, the General Counsel seeks an Order requiring that Respondent promptly request that the Postal Service reinstate Anthoula Contogiannis to her former position or, if the position no longer exists, to a substantially equivalent position. If the Postal Service refuses to reinstate Anthoula Contogiannis, the General Counsel seeks an Order requiring Respondent, among other things, to request that the Postal Service process a grievance over Anthoula Contogiannis' notice of removal and discharge, and to pursue the grievance in good faith with due diligence, including permitting Anthoula Contogiannis to have counsel or another representative of her own choosing present at the grievance-arbitration proceedings. If it is no longer possible for Respondent to pursue Anthoula Contogiannis' grievance concerning her notice of removal and discharge, and if the General Counsel of the Board shows in a subsequent compliance proceeding that a timely pursued grievance on these issues would have been successful, the General Counsel also requests that Respondent be ordered to make Anthoula Contogiannis whole for any loss of earnings and other benefits suffered as a result of her discharge on August 29, 2018, until such time as she is reinstated by the Postal Service or she obtains other substantially equivalent employment. The General Counsel further seeks all other relief as may be just and proper to remedy the unfair labor practices alleged.

ANSWER REQUIREMENT

Respondent is notified that, pursuant to Sections 102.20 and 102.21 of the Board's Rules and Regulations, it must file an answer to the complaint. The answer must be **received by this office on or before July 1, 2019, or postmarked on or before June 30, 2019.** Respondent should

file an original and four copies of the answer with this office and serve a copy of the answer on each of the other parties.

An answer may also be filed electronically through the Agency's website. To file electronically, go to www.nlr.gov, click on **E-File Documents**, enter the NLRB Case Number, and follow the detailed instructions. The responsibility for the receipt and usability of the answer rests exclusively upon the sender. Unless notification on the Agency's website informs users that the Agency's E-Filing system is officially determined to be in technical failure because it is unable to receive documents for a continuous period of more than two hours after 12:00 noon (Eastern Time) on the due date for filing, a failure to timely file the answer will not be excused on the basis that the transmission could not be accomplished because the Agency's website was off-line or unavailable for some other reason. The Board's Rules and Regulations require that an answer be signed by counsel or non-attorney representative for represented parties or by the party if not represented. See Section 102.21. If the answer being filed electronically is a PDF document containing the required signature, no paper copies of the answer need to be transmitted to the Regional Office. However, if the electronic version of an answer to a complaint is not a PDF file containing the required signature, then the E-filing rules require that such answer containing the required signature continue to be submitted to the Regional Office by traditional means within three business days after the date of electronic filing. Service of the answer on each of the other parties must still be accomplished by means allowed under the Board's Rules and Regulations. The answer may not be filed by facsimile transmission. If no answer is filed, or if an answer is filed untimely, the Board may find, pursuant to a Motion for Default Judgment, that the allegations in the complaint are true.

NOTICE OF HEARING

PLEASE TAKE NOTICE THAT on **September 4, 2019, at 10:00 a.m., in the Paris Favors Jr. Hearing Room located in the Subregion 11 Office of the National Labor Relations Board, 4035 University Parkway, Suite 200, Winston-Salem, North Carolina**, and on consecutive days thereafter until concluded, a hearing will be conducted before an administrative law judge of the National Labor Relations Board. At the hearing, Respondent and any other party to this proceeding have the right to appear and present testimony regarding the allegations in this complaint. The procedures to be followed at the hearing are described in the attached Form NLRB-4668. The procedure to request a postponement of the hearing is described in the attached Form NLRB-4338.

Dated: June 17, 2019

Lisa Y. Henderson
Acting Regional Director
National Labor Relations Board
Region 10, By



Scott C. Thompson
Officer-in-Charge
National Labor Relations Board
Subregion 11
4035 University Pkwy Ste 200
Winston Salem, NC 27106-3275

Attachments

EXHIBIT 4

UNITED STATES GOVERNMENT
NATIONAL LABOR RELATIONS BOARD
NOTICE

Case 10-CB-231385

The issuance of the notice of formal hearing in this case does not mean that the matter cannot be disposed of by agreement of the parties. On the contrary, it is the policy of this office to encourage voluntary adjustments. The examiner or attorney assigned to the case will be pleased to receive and to act promptly upon your suggestions or comments to this end.

An agreement between the parties, approved by the Regional Director, would serve to cancel the hearing. However, unless otherwise specifically ordered, the hearing will be held at the date, hour, and place indicated. Postponements *will not be granted* unless good and sufficient grounds are shown *and* the following requirements are met:

- (1) The request must be in writing. An original and two copies must be filed with the Regional Director when appropriate under 29 CFR 102.16(a) or with the Division of Judges when appropriate under 29 CFR 102.16(b).
- (2) Grounds must be set forth in *detail*;
- (3) Alternative dates for any rescheduled hearing must be given;
- (4) The positions of all other parties must be ascertained in advance by the requesting party and set forth in the request; and
- (5) Copies must be simultaneously served on all other parties (listed below), and that fact must be noted on the request.

Except under the most extreme conditions, no request for postponement will be granted during the three days immediately preceding the date of hearing.

Anthoula Contogiannis
5022 US Highway 220 N
Summerfield, NC 27358-9761

Amanda Hodges, Officer in Charge
United States Postal Service
201 Piedmont St
Reidsville, NC 27320-3869

Roderick D. Eves, Deputy Managing Counsel
United States Postal Service
Law Department - NLRB Unit
1720 Market St Rm 2400
St. Louis, MO 63155-9948

John Harris, President
American Postal Workers Union Local 1901
201 Piedmont St
Reidsville, NC 27320-3869

Procedures in NLRB Unfair Labor Practice Hearings

The attached complaint has scheduled a hearing that will be conducted by an administrative law judge (ALJ) of the National Labor Relations Board who will be an independent, impartial finder of facts and applicable law. **You may be represented at this hearing by an attorney or other representative.** If you are not currently represented by an attorney, and wish to have one represent you at the hearing, you should make such arrangements as soon as possible. A more complete description of the hearing process and the ALJ's role may be found at Sections 102.34, 102.35, and 102.45 of the Board's Rules and Regulations. The Board's Rules and regulations are available at the following link: www.nlr.gov/sites/default/files/attachments/basic-page/node-1717/rules_and_regs_part_102.pdf.

The NLRB allows you to file certain documents electronically and you are encouraged to do so because it ensures that your government resources are used efficiently. To e-file go to the NLRB's website at www.nlr.gov, click on "e-file documents," enter the 10-digit case number on the complaint (the first number if there is more than one), and follow the prompts. You will receive a confirmation number and an e-mail notification that the documents were successfully filed.

Although this matter is set for trial, this does not mean that this matter cannot be resolved through a settlement agreement. The NLRB recognizes that adjustments or settlements consistent with the policies of the National Labor Relations Act reduce government expenditures and promote amity in labor relations and encourages the parties to engage in settlement efforts.

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7015 0640 0002 9053 5452

U.S. Postal Service™
CERTIFIED MAIL® RECEIPT
Domestic Mail Only

For delivery information, visit our website at www.usps.com®.

OFFICIAL USE

Certified Mail Fee	
\$	
Extra Services & Fees (check box, add fee as appropriate)	
<input type="checkbox"/> Return Receipt (hardcopy)	\$ _____
<input type="checkbox"/> Return Receipt (electronic)	\$ _____
<input type="checkbox"/> Certified Mail Restricted Delivery	\$ _____
<input type="checkbox"/> Adult Signature Required	\$ _____
<input type="checkbox"/> Adult Signature Restricted Delivery	\$ _____

Postmark
Here

John Harris, President
American Postal Workers Union Local 1901
201 Piedmont St
Reidsville, NC 27320-3869
CPT:10-CB-231385:AB:6/17/19

PS Form 3800, April 2015 PSN 7530-02-000-9047 See Reverse for Instructions

7573580

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:
John Harris, President
American Postal Workers Union Local 1901
201 Piedmont St
Reidsville, NC 27320-3869

CPT:10-CB-231385:AB:6/17/19



9590 9401 0075 5168 7358 04

2. Article Number (Transfer from service label)

7015 0640 0002 9053 5452

PS Form 3811, April 2015 PSN 7530-02-000-9053

COMPLETE THIS SECTION ON DELIVERY

A. Signature Agent
X Addressee

B. Received by (Printed Name) C. Date of Delivery

D. Is delivery address different from item 1? Yes
If YES, enter delivery address below: No

3. Service Type

<input type="checkbox"/> Adult Signature	<input type="checkbox"/> Priority Mail Express®
<input type="checkbox"/> Adult Signature Restricted Delivery	<input type="checkbox"/> Registered Mail™
<input checked="" type="checkbox"/> Certified Mail®	<input type="checkbox"/> Registered Mail Restricted Delivery
<input type="checkbox"/> Certified Mail Restricted Delivery	<input checked="" type="checkbox"/> Return Receipt for Merchandise
<input type="checkbox"/> Collect on Delivery	<input type="checkbox"/> Signature Confirmation™
<input type="checkbox"/> Collect on Delivery Restricted Delivery	<input type="checkbox"/> Signature Confirmation Restricted Delivery
<input type="checkbox"/> Insured Mail	
<input type="checkbox"/> Insured Mail Restricted Delivery (over \$500)	

Domestic Return Receipt



FAQs > (<https://www.usps.com/faqs/uspstracking-faqs.htm>)

Track Another Package +

Tracking Number: 70150640000290535452

Remove X

This is a reminder to arrange for redelivery of your item or your item will be returned to sender.

Delivery Attempt

Reminder to Schedule Redelivery of your item

Tracking History

Feedback
^

Reminder to Schedule Redelivery of your item

This is a reminder to arrange for redelivery of your item or your item will be returned to sender.

June 19, 2019, 8:43 am

Available for Pickup

REIDSVILLE, NC 27320

June 19, 2019, 7:37 am

Out for Delivery

REIDSVILLE, NC 27320

June 19, 2019, 6:41 am

Arrived at Unit

REIDSVILLE, NC 27320

June 19, 2019, 3:29 am

Departed USPS Regional Facility

GREENSBORO NC DISTRIBUTION CENTER

June 18, 2019, 10:24 pm
Arrived at USPS Regional Facility
GREENSBORO NC DISTRIBUTION CENTER

Product Information



See Less ^

Can't find what you're looking for?

Go to our FAQs section to find answers to your tracking questions.

FAQs (<https://www.usps.com/faqs/uspstracking-faqs.htm>)

Feedback

The easiest tracking number is the one you don't have to know.

With Informed Delivery[®], you never have to type in another tracking number. Sign up to:

- See images* of incoming mail.

- Automatically track the packages you're expecting.
- Set up email and text alerts so you don't need to enter tracking numbers.
- Enter USPS Delivery Instructions™ for your mail carrier.

Sign Up

([https://reg.usps.com/entreg/RegistrationAction_input?](https://reg.usps.com/entreg/RegistrationAction_input?app=UspsTools&appURL=https%3A%2F%2Ftools.usps.com%2Fgc)

*NOTE: Black and white (grayscale) images show the outside, front of letter-sized envelopes and mailpieces that are processed through USPS automated equipment.

Feedback

EXHIBIT 5

,

UNITED STATES OF AMERICA
BEFORE THE NATIONAL LABOR RELATIONS BOARD
REGION 10, SUBREGION 11

**AMERICAN POSTAL WORKERS UNION, AFL –
CIO, LOCAL 1901 (UNITED STATES POSTAL
SERVICE)**

and

Case 10–CB–231385

ANTHOULA CONTOGIANNIS, an Individual

COMPLAINT AND NOTICE OF HEARING

This Complaint and Notice of Hearing is based on a charge filed by Anthoula Contogiannis, an individual. It is issued pursuant to Section 10(b) of the National Labor Relations Act, 29 U.S.C. § 151 et seq. (the Act), the Postal Reorganization Act, 39 U.S.C. § 101 et seq. (PRA), and Section 102.15 of the Rules and Regulations of the National Labor Relations Board (the Board) and alleges that American Postal Workers Union, AFL-CIO, Local 1901 (Respondent) has violated the Act as described below.

1.

Anthoula Contogiannis filed the charge in this proceeding on November 20, 2018, and a copy was served on Respondent by U.S. mail on the same date.

2.

The United States Postal Service (Postal Service) provides postal services for the United States and operates various facilities throughout the United States in performing that function, including its Post Office involved in this proceeding located at 201 Piedmont Street, Reidsville, North Carolina.

3.

The Board has jurisdiction over Respondent and this matter by virtue of Section 1209 of the PRA.

4.

(a) At all material times, Respondent has been a labor organization within the meaning of Section 2(5) of the Act.

(b) At all material times, American Postal Workers Union, AFL-CIO (the National Union) has been a labor organization within the meaning of Section 2(5) of the Act.

5.

At all material times, the following individuals held the positions set forth opposite their respective names and have been agents of Respondent within the meaning of Section 2(13) of the Act:

John Harris	—	President
Turnette Chestnut	—	Shop Steward

6.

At all material times, by virtue of Section 9(a) of the Act, the National Union has been the exclusive collective-bargaining representative of the following employees of the Postal Service (the Unit):

All employees in the bargaining unit for which each has been recognized and certified at the national level, including maintenance employees, motor vehicle employees, postal clerks, special delivery messengers, mail equipment shops employees, material distribution centers employees, and operating services and facilities services employees; and excluding managerial and supervisory personnel, professional employees, employees engaged in personnel work other than a purely non-confidential clerical capacity, security guards as defined in Public Law 91-375, 1201(2), all Postal Inspection Service employees, employees in the supplemental work

forces as defined in Article 7 of the Collective-Bargaining Agreement, rural letter carriers, mail handlers, and letter carriers.

7.

Since about July 20, 1971, and at all material times, the National Union has been the designated exclusive collective-bargaining representative of the Unit employed by the Postal Service and during that time, the National Union, and its affiliated locals on behalf of the National Union, including Respondent, have been recognized as such representative by the Postal Service.

8.

At all material times, the National Union and the Postal Service have maintained and enforced a collective-bargaining agreement covering the terms and conditions of employment of the Unit, including a grievance and arbitration procedure. That collective-bargaining agreement was effective on its face from May 21, 2015 through September 20, 2018. Prior to its expiration on September 20, 2018, the parties to the agreement extended the collective-bargaining agreement until agreement or interest arbitration on a successor contract.

9.

Since about September 11, 2018, Respondent has failed to process a grievance that Unit employee Anthoula Contogiannis filed or attempted to file under the provisions of the collective-bargaining agreement described above in paragraph 8, regarding her notice of removal and discharge from the Postal Service.

10.

On October 16, 2018, Anthoula Contogiannis requested in writing, via text message, that Respondent provide her with a copy of her grievance and the status of her grievance as described above in paragraph 9.

11.

Since September 11, 2018, Respondent has failed to keep Anthoula Contogiannis informed as to the status of her grievance as described above in paragraph 9.

12.

Since October 16, 2018, Respondent has failed and refused to provide Anthoula Contogiannis with a copy of her grievance and the status of her grievance as described above in paragraph 10.

13.

Respondent's conduct described above in paragraphs 9, 11, and 12 was arbitrary.

14.

By engaging in the conduct described above in paragraphs 9 and 11 through 13 in connection with its representative status described above in paragraphs 6 through 8, Respondent has failed to represent Anthoula Contogiannis for reasons that are arbitrary, discriminatory, or in bad faith and has breached the fiduciary duty it owes to this employee and to the Unit.

By the conduct described above in paragraphs 9 and 11 through 14, Respondent has been restraining and coercing employees in the exercise of the rights guaranteed in Section 7 of the Act in violation of Section 8(b)(1)(A) of the Act and within the meaning of the PRA.

REMEDIES

As part of the remedy for the unfair labor practices alleged above in paragraphs 9 and 11 through 15, the General Counsel seeks an Order requiring that Respondent promptly request that the Postal Service reinstate Anthoula Contogiannis to her former position or, if the position no longer exists, to a substantially equivalent position. If the Postal Service refuses to reinstate Anthoula Contogiannis, the General Counsel seeks an Order requiring Respondent, among other things, to request that the Postal Service process a grievance over Anthoula Contogiannis' notice of removal and discharge, and to pursue the grievance in good faith with due diligence, including permitting Anthoula Contogiannis to have counsel or another representative of her own choosing present at the grievance-arbitration proceedings. If it is no longer possible for Respondent to pursue Anthoula Contogiannis' grievance concerning her notice of removal and discharge, and if the General Counsel of the Board shows in a subsequent compliance proceeding that a timely pursued grievance on these issues would have been successful, the General Counsel also requests that Respondent be ordered to make Anthoula Contogiannis whole for any loss of earnings and other benefits suffered as a result of her discharge on August 29, 2018, until such time as she is reinstated by the Postal Service or she obtains other substantially equivalent employment. The General Counsel further seeks all other relief as may be just and proper to remedy the unfair labor practices alleged.

ANSWER REQUIREMENT

Respondent is notified that, pursuant to Sections 102.20 and 102.21 of the Board's Rules and Regulations, it must file an answer to the complaint. The answer must be **received by this office on or before July 22, 2019, or postmarked on or before July 21, 2019.** Respondent should file an original and four copies of the answer with this office and serve a copy of the answer on each of the other parties.

An answer may also be filed electronically through the Agency's website. To file electronically, go to www.nlr.gov, click on **E-File Documents**, enter the NLRB Case Number, and follow the detailed instructions. The responsibility for the receipt and usability of the answer rests exclusively upon the sender. Unless notification on the Agency's website informs users that the Agency's E-Filing system is officially determined to be in technical failure because it is unable to receive documents for a continuous period of more than two hours after 12:00 noon (Eastern Time) on the due date for filing, a failure to timely file the answer will not be excused on the basis that the transmission could not be accomplished because the Agency's website was off-line or unavailable for some other reason. The Board's Rules and Regulations require that an answer be signed by counsel or non-attorney representative for represented parties or by the party if not represented. See Section 102.21. If the answer being filed electronically is a PDF document containing the required signature, no paper copies of the answer need to be transmitted to the Regional Office. However, if the electronic version of an answer to a complaint is not a PDF file containing the required signature, then the E-filing rules require that such answer containing the required signature continue to be submitted to the Regional Office by traditional means within three business days after the date of electronic filing. Service of the answer on each of the other parties must still be accomplished by means allowed under the Board's Rules and Regulations. The answer may not be filed by facsimile transmission. If no answer is filed,

or if an answer is filed untimely, the Board may find, pursuant to a Motion for Default Judgment, that the allegations in the complaint are true.

NOTICE OF HEARING

PLEASE TAKE NOTICE THAT on **September 4, 2019, at 10:00 a.m., in the Paris Favors Jr. Hearing Room located in the Subregion 11 Office of the National Labor Relations Board, 4035 University Parkway, Suite 200, Winston-Salem, North Carolina,** and on consecutive days thereafter until concluded, a hearing will be conducted before an administrative law judge of the National Labor Relations Board. At the hearing, Respondent and any other party to this proceeding have the right to appear and present testimony regarding the allegations in this complaint. The procedures to be followed at the hearing are described in the attached Form NLRB-4668. The procedure to request a postponement of the hearing is described in the attached Form NLRB-4338.

Dated: July 8, 2019

John D. Doyle
Regional Director
National Labor Relations Board
Region 10, By



Scott C. Thompson
Officer-in-Charge
National Labor Relations Board
Subregion 11
4035 University Pkwy Ste 200
Winston Salem, NC 27106-3275

Attachments

EXHIBIT 6

**UNITED STATES OF AMERICA
BEFORE THE NATIONAL LABOR RELATIONS BOARD
REGION 10, SUBREGION 11**

**AMERICAN POSTAL WORKERS UNION, AFL – CIO,
LOCAL 1901 (UNITED STATES POSTAL SERVICE)**

and

Case 10–CB–231385

ANTHOULA CONTOGIANNIS, an Individual

AFFIDAVIT OF SERVICE OF: Reissued Complaint and Notice of Hearing (with forms NLRB-4338 and NLRB-4668 attached)

I, the undersigned employee of the National Labor Relations Board, being duly sworn, say that on **July 8, 2019**, I served the above-entitled document(s) by **certified or regular mail**, as noted below, upon the following persons, addressed to them at the following addresses:

John Harris, President
American Postal Workers Union Local 1901
201 Piedmont St
Reidsville, NC 27320-3869

**CERTIFIED MAIL, RETURN RECEIPT
REQUESTED**

John Harris, President
American Postal Workers Union Local 1901
PO Box 104
Reidsville, NC 27320

**CERTIFIED MAIL, RETURN RECEIPT
REQUESTED**

Anthoula Contogiannis
5022 US Highway 220 N
Summerfield, NC 27358-9761

CERTIFIED MAIL

Amanda Hodges, Officer in Charge
United States Postal Service
201 Piedmont St
Reidsville, NC 27320-3869

FIRST CLASS MAIL

Roderick D. Eves, Deputy Managing Counsel
United States Postal Service
Law Department - NLRB Unit
1720 Market St Rm 2400
St. Louis, MO 63155-9948

FIRST CLASS MAIL

July 8, 2019

Date

Kevin S. Crawford, Designated Agent of NLRB

Name

/s/ Kevin S. Crawford

Signature

UNITED STATES GOVERNMENT
NATIONAL LABOR RELATIONS BOARD
NOTICE

Case 10-CB-231385

The issuance of the notice of formal hearing in this case does not mean that the matter cannot be disposed of by agreement of the parties. On the contrary, it is the policy of this office to encourage voluntary adjustments. The examiner or attorney assigned to the case will be pleased to receive and to act promptly upon your suggestions or comments to this end.

An agreement between the parties, approved by the Regional Director, would serve to cancel the hearing. However, unless otherwise specifically ordered, the hearing will be held at the date, hour, and place indicated. Postponements *will not be granted* unless good and sufficient grounds are shown *and* the following requirements are met:

- (1) The request must be in writing. An original and two copies must be filed with the Regional Director when appropriate under 29 CFR 102.16(a) or with the Division of Judges when appropriate under 29 CFR 102.16(b).
- (2) Grounds must be set forth in *detail*;
- (3) Alternative dates for any rescheduled hearing must be given;
- (4) The positions of all other parties must be ascertained in advance by the requesting party and set forth in the request; and
- (5) Copies must be simultaneously served on all other parties (listed below), and that fact must be noted on the request.

Except under the most extreme conditions, no request for postponement will be granted during the three days immediately preceding the date of hearing.

Anthoula Contogiannis
5022 US Highway 220 N
Summerfield, NC 27358-9761

Amanda Hodges, Officer in Charge
United States Postal Service
201 Piedmont St
Reidsville, NC 27320-3869

Roderick D. Eves, Deputy Managing Counsel
United States Postal Service
Law Department - NLRB Unit
1720 Market St Rm 2400
St. Louis, MO 63155-9948

John Harris, President
American Postal Workers Union Local 1901
201 Piedmont St
Reidsville, NC 27320-3869

John Harris, President
American Postal Workers Union Local 1901
PO Box 104
Reidsville, NC 27320

Procedures in NLRB Unfair Labor Practice Hearings

The attached complaint has scheduled a hearing that will be conducted by an administrative law judge (ALJ) of the National Labor Relations Board who will be an independent, impartial finder of facts and applicable law. **You may be represented at this hearing by an attorney or other representative.** If you are not currently represented by an attorney, and wish to have one represent you at the hearing, you should make such arrangements as soon as possible. A more complete description of the hearing process and the ALJ's role may be found at Sections 102.34, 102.35, and 102.45 of the Board's Rules and Regulations. The Board's Rules and regulations are available at the following link: www.nlr.gov/sites/default/files/attachments/basic-page/node-1717/rules_and_regs_part_102.pdf.

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For delivery information, visit our website at www.usps.com®.

OFFICIAL USE

Certified Mail Fee

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Extra Services & Fees (check box, add fee as appropriate)

- Return Receipt (hardcopy) \$ _____
- Return Receipt (electronic) \$ _____
- Certified Mail Restricted Delivery \$ _____
- Adult Signature Required \$ _____
- Adult Signature Restricted Delivery \$ _____

Postmark
Here

7015 0640 0002 9053 2437

John Harris, President
 American Postal Workers Union Local 1901
 201 Piedmont St
 Reidsville, NC 27320-3869
 CPT:10-CB-231385:AB:7/8/19

PS Form 3800, April 2015 PSN 7530-02-000-9047 See Reverse for Instructions

7573603

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

John Harris, President
 American Postal Workers Union Local 1901
 201 Piedmont St
 Reidsville, NC 27320-3869

CPT:10-CB-231385:AB:7/8/19



9590 9401 0075 5168 7360 30

2. Article Number (Transfer from service label)

7015 0640 0002 9053 2437

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X

- Agent
- Addressee

B. Received by (Printed Name)

C. Date of Delivery

D. Is delivery address different from item 1? Yes
 If YES, enter delivery address below: No

3. Service Type

- Adult Signature
- Adult Signature Restricted Delivery
- Certified Mail®
- Certified Mail Restricted Delivery
- Collect on Delivery
- Collect on Delivery Restricted Delivery
- Insured Mail
- Insured Mail Restricted Delivery (over \$500)
- Priority Mail Express®
- Registered Mail™
- Registered Mail Restricted Delivery
- Return Receipt for Merchandise
- Signature Confirmation™
- Signature Confirmation Restricted Delivery

PS Form 3811, April 2015 PSN 7530-02-000-9053

Domestic Return Receipt



FAQs > (<https://www.usps.com/faqs/uspstracking-faqs.htm>)

Track Another Package +

Tracking Number: 70150640000290532437

Remove X

This is a reminder to arrange for redelivery of your item or your item will be returned to sender.

Delivery Attempt

Reminder to Schedule Redelivery of your item

Get Updates v

Feedback

Text & Email Updates



Tracking History



Reminder to Schedule Redelivery of your item

This is a reminder to arrange for redelivery of your item or your item will be returned to sender.

July 10, 2019, 8:49 am
Available for Pickup
REIDSVILLE, NC 27320

July 10, 2019, 7:39 am
Out for Delivery
REIDSVILLE, NC 27320

July 10, 2019, 6:23 am
Arrived at Unit
REIDSVILLE, NC 27320

July 9, 2019, 3:48 am

Departed USPS Regional Facility
GREENSBORO NC DISTRIBUTION CENTER

July 8, 2019, 10:47 pm

Arrived at USPS Regional Facility
GREENSBORO NC DISTRIBUTION CENTER

Product Information



See Less ^

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FAQs (<https://www.usps.com/faqs/uspstracking-faqs.htm>)

Feedback

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[https://reg.usps.com/entreg/RegistrationAction_input?](https://reg.usps.com/entreg/RegistrationAction_input?app=UspsTools&appURL=https%3A%2F%2Ftools.usps.com%2Fgc)

*NOTE: Black and white (grayscale) images show the outside, front of letter-sized envelopes and mailpieces that are processed through USPS automated equipment.

Feedback

U.S. Postal Service™
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Domestic Mail Only

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OFFICIAL USE

Certified Mail Fee	
\$	_____
Extra Services & Fees (check box, add fee as appropriate)	
<input type="checkbox"/> Return Receipt (hardcopy)	\$ _____
<input type="checkbox"/> Return Receipt (electronic)	\$ _____
<input type="checkbox"/> Certified Mail Restricted Delivery	\$ _____
<input type="checkbox"/> Adult Signature Required	\$ _____
<input type="checkbox"/> Adult Signature Restricted Delivery	\$ _____

Postmark
Here

John Harris, President
 American Postal Workers Union Local 1901
 PO Box 104
 Reidsville NC 27320
 CPT:10-CB-231385:AB:7/8/19

PS Form 3800, April 2015 PSN 7530-02-000-9047 See Reverse for Instructions

7015 0640 0002 9053 2413

7573685

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY																
<ul style="list-style-type: none"> Complete items 1, 2, and 3. Print your name and address on the reverse so that we can return the card to you. Attach this card to the back of the mailpiece, or on the front if space permits. 	<p>A. Signature <input type="checkbox"/> Agent <input checked="" type="checkbox"/> Addressee</p> <p>B. Received by (Printed Name) C. Date of Delivery</p> <p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No</p>																
<p>1. Article Addressed to:</p> <p>John Harris, President American Postal Workers Union Local 1901 PO Box 104 Reidsville, NC 27320</p> <p>CPT:10-CB-231385:AB:7/8/19</p>  <p>9590 9401 0075 5168 7368 56</p>	<p>3. Service Type</p> <table border="0"> <tr> <td><input type="checkbox"/> Adult Signature</td> <td><input type="checkbox"/> Priority Mail Express®</td> </tr> <tr> <td><input type="checkbox"/> Adult Signature Restricted Delivery</td> <td><input type="checkbox"/> Registered Mail™</td> </tr> <tr> <td><input type="checkbox"/> Certified Mail®</td> <td><input type="checkbox"/> Registered Mail Restricted Delivery</td> </tr> <tr> <td><input type="checkbox"/> Certified Mail Restricted Delivery</td> <td><input type="checkbox"/> Return Receipt for Merchandise</td> </tr> <tr> <td><input type="checkbox"/> Collect on Delivery</td> <td><input type="checkbox"/> Signature Confirmation™</td> </tr> <tr> <td><input type="checkbox"/> Collect on Delivery Restricted Delivery</td> <td><input type="checkbox"/> Signature Confirmation Restricted Delivery</td> </tr> <tr> <td><input type="checkbox"/> Insured Mail</td> <td></td> </tr> <tr> <td><input type="checkbox"/> Insured Mail Restricted Delivery (over \$500)</td> <td></td> </tr> </table>	<input type="checkbox"/> Adult Signature	<input type="checkbox"/> Priority Mail Express®	<input type="checkbox"/> Adult Signature Restricted Delivery	<input type="checkbox"/> Registered Mail™	<input type="checkbox"/> Certified Mail®	<input type="checkbox"/> Registered Mail Restricted Delivery	<input type="checkbox"/> Certified Mail Restricted Delivery	<input type="checkbox"/> Return Receipt for Merchandise	<input type="checkbox"/> Collect on Delivery	<input type="checkbox"/> Signature Confirmation™	<input type="checkbox"/> Collect on Delivery Restricted Delivery	<input type="checkbox"/> Signature Confirmation Restricted Delivery	<input type="checkbox"/> Insured Mail		<input type="checkbox"/> Insured Mail Restricted Delivery (over \$500)	
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<input type="checkbox"/> Collect on Delivery	<input type="checkbox"/> Signature Confirmation™																
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<input type="checkbox"/> Insured Mail Restricted Delivery (over \$500)																	
<p>2. Article Number (Transfer from service label)</p> <p>7015 0640 0002 9053 2413</p>																	
PS Form 3811, April 2015 PSN 7530-02-000-9053	Domestic Return Receipt																



FAQs > (<https://www.usps.com/faqs/uspstracking-faqs.htm>)

Track Another Package +

Tracking Number: 70150640000290532413

Remove X

This is a reminder to arrange for redelivery of your item or your item will be returned to sender.

Delivery Attempt

Reminder to Schedule Redelivery of your item

Get Updates

Feedback

Text & Email Updates

Tracking History

Reminder to Schedule Redelivery of your item

This is a reminder to arrange for redelivery of your item or your item will be returned to sender.

July 10, 2019, 8:49 am

Available for Pickup
REIDSVILLE, NC 27320

July 10, 2019, 6:23 am

Arrived at Unit
REIDSVILLE, NC 27320

July 10, 2019, 12:17 am

Departed USPS Regional Facility
GREENSBORO NC DISTRIBUTION CENTER

July 8, 2019, 10:47 pm

Arrived at USPS Regional Facility

GREENSBORO NC DISTRIBUTION CENTER

Product Information



See Less ^

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- Enter USPS Delivery Instructions™ for your mail carrier.

Sign Up

([https://reg.usps.com/entreg/RegistrationAction_input?](https://reg.usps.com/entreg/RegistrationAction_input?app=UspsTools&appURL=https%3A%2F%2Ftools.usps.com%2Fgo)

*NOTE: Black and white (grayscale) images show the outside, front of letter-sized envelopes and mailpieces that are processed through USPS automated equipment.

Feedback

EXHIBIT 7



UNITED STATES GOVERNMENT
NATIONAL LABOR RELATIONS BOARD

SUBREGION 11
4035 University Pkwy Ste 200
Winston Salem, NC 27106-3275

Agency Website: www.nlr.gov
Telephone: (336)631-5201
Fax: (336)631-5210

July 23, 2019

John Harris, President
American Postal Workers Union Local 1901
201 Piedmont Street
Reidsville, NC 27320

Re: American Postal Workers Union Local 1901
(Postal Service – Reidsville, NC)
Case 10-CB-231385

Dear Mr. Harris:

The Region issued a Complaint and Notice of Hearing in this matter on July 8, 2019, and you were notified that pursuant to Section 102.20 of the Board's rules and Regulations, you must file an answer to the Complaint. The Complaint further stated that, "The answer must be received by this office on or before July 22, 2019 or postmarked on or before July 21, 2019." To date, we have not received an answer to the Complaint.

This letter is to notify you that if you do not file a proper answer to the Complaint in compliance with Section 102.20 of the Board's Rules by July 29, 2019, the Region will file a motion for default judgment with the Board.

If you have any questions, please do not hesitate to contact Field Attorney Jordan N. Wolfe at (336) 582-7145 or me at (336)582-7143.

Sincerely,

A handwritten signature in black ink, appearing to read "Scott C. Thompson".

Scott C. Thompson
Officer-in-Charge

EXHIBIT 8



UNITED STATES GOVERNMENT
NATIONAL LABOR RELATIONS BOARD

SUBREGION 11
4035 University Pkwy Ste 200
Winston Salem, NC 27106-3275

Agency Website: www.nlr.gov
Telephone: (336)631-5201
Fax: (336)631-5210

July 23, 2019

John Harris, President
American Postal Workers Union Local 1901
PO Box 104
Reidsville, NC 27320

Re: American Postal Workers Union Local 1901
(Postal Service – Reidsville, NC)
Case 10-CB-231385

Dear Mr. Harris:

The Region issued a Complaint and Notice of Hearing in this matter on July 8, 2019, and you were notified that pursuant to Section 102.20 of the Board's rules and Regulations, you must file an answer to the Complaint. The Complaint further stated that, "The answer must be received by this office on or before July 22, 2019 or postmarked on or before July 21, 2019." To date, we have not received an answer to the Complaint.

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If you have any questions, please do not hesitate to contact Field Attorney Jordan N. Wolfe at (336) 582-7145 or me at (336)582-7143.

Sincerely,

A handwritten signature in black ink, appearing to read "Scott C. Thompson".

Scott C. Thompson
Officer-in-Charge

EXHIBIT 9



UNITED STATES GOVERNMENT
NATIONAL LABOR RELATIONS BOARD

SUBREGION 11
4035 University Pkwy Ste 200
Winston Salem, NC 27106-3275

Agency Website: www.nlr.gov
Telephone: (336)631-5201
Fax: (336)631-5210

July 25, 2019

John Harris, President
American Postal Workers Union Local 1901
201 Piedmont Street
Reidsville, NC 27320

Re: American Postal Workers Union Local 1901
(Postal Service – Reidsville, NC)
Case 10-CB-231385

Dear Mr. Harris:

On July 23, 2019, I sent you a letter explaining the following:

The Region issued a Complaint and Notice of Hearing in this matter on July 8, 2019, and you were notified that pursuant to Section 102.20 of the Board's rules and Regulations, you must file an answer to the Complaint. The Complaint further stated that, "The answer must be received by this office on or before July 22, 2019 or postmarked on or before July 21, 2019." To date, we have not received an answer to the Complaint.

This letter is to notify you that if you do not file a proper answer to the Complaint in compliance with Section 102.20 of the Board's Rules by July 29, 2019, the Region will file a motion for default judgment with the Board.

If you have any questions, please do not hesitate to contact Field Attorney Jordan N. Wolfe at (336) 582-7145 or me at (336)582-7143.

This letter is to inform you that the July 29, 2019, deadline above is incorrect and that you have until July 30, 2019, to file a proper answer to the Complaint in compliance with Section 102.20 of the Board's rules.

Sincerely,

A handwritten signature in black ink, appearing to read "Scott C. Thompson".

Scott C. Thompson
Officer-in-Charge

EXHIBIT 10



UNITED STATES GOVERNMENT
NATIONAL LABOR RELATIONS BOARD

SUBREGION 11
4035 University Pkwy Ste 200
Winston Salem, NC 27106-3275

Agency Website: www.nlr.gov
Telephone: (336)631-5201
Fax: (336)631-5210

July 25, 2019

John Harris, President
American Postal Workers Union Local 1901
PO Box 104
Reidsville, NC 27320

Re: American Postal Workers Union Local 1901
(Postal Service – Reidsville, NC)
Case 10-CB-231385

Dear Mr. Harris:

On July 23, 2019, I sent you a letter explaining the following:

The Region issued a Complaint and Notice of Hearing in this matter on July 8, 2019, and you were notified that pursuant to Section 102.20 of the Board's rules and Regulations, you must file an answer to the Complaint. The Complaint further stated that, "The answer must be received by this office on or before July 22, 2019 or postmarked on or before July 21, 2019." To date, we have not received an answer to the Complaint.

This letter is to notify you that if you do not file a proper answer to the Complaint in compliance with Section 102.20 of the Board's Rules by July 29, 2019, the Region will file a motion for default judgment with the Board.

If you have any questions, please do not hesitate to contact Field Attorney Jordan N. Wolfe at (336) 582-7145 or me at (336)582-7143.

This letter is to inform you that the July 29, 2019, deadline above is incorrect and that you have until July 30, 2019, to file a proper answer to the Complaint in compliance with Section 102.20 of the Board's rules.

Sincerely,

A handwritten signature in black ink, appearing to read "Scott C. Thompson".

Scott C. Thompson
Officer-in-Charge

EXHIBIT 11

American Postal Workers Union, AFL-CIO,
LOCAL 1901 (United States Postal
Service)
Case 10-CB-231385

Confidential Witness Affidavit

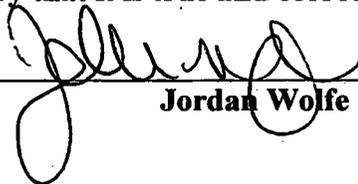
I, Jordan Wolfe, state as follows:

1. I am a Field Attorney for the National Labor Relations Board, Region 10, Subregion 11, in Winston-Salem, North Carolina.
2. On Friday, August 2, 2019, I traveled to the Reidsville, NC Post Office at 201 Piedmont Street, Reidsville, North Carolina, 27320.
3. I waited in line with the customers and a male postal worker called me up to his window. I asked to speak with John Harris and the postal worker identified himself as John Harris. I then served a copy of the Complaint and Notice of Hearing, dated July 8, 2019, on John Harris, and left.

I have read this Confidential Witness Affidavit consisting of 1 page, including this page, I fully understand it, and I state under penalty of perjury that it is true and correct.

Date: August 13, 2019

Signature:



Jordan Wolfe

Initials: 

EXHIBIT 12



UNITED STATES GOVERNMENT
NATIONAL LABOR RELATIONS BOARD

SUBREGION 11
4035 University Pkwy Ste 200
Winston Salem, NC 27106-3275

Agency Website: www.nlr.gov
Telephone: (336)631-5201
Fax: (336)631-5210

Agent's Direct Dial: (336)582-7145

August 8, 2019

John Harris, President
American Postal Workers Union Local 1901
201 Piedmont Street
Reidsville, NC 27320

John Harris, President
American Postal Workers Union Local 1901
PO Box 104
Reidsville, NC 27320

John Harris, President
American Postal Workers Union Local 1901
2517 Patriot Way
Greensboro, NC 27408

Re: American Postal Workers Union, AFL-
CIO, LOCAL 1901 (United States Postal
Service)
Case 10-CB-231385

Dear Mr. Harris:

On August 2, 2019, I served you, in person, with a Complaint and Notice of Hearing. If you do not file a proper answer by **Friday, August 16, 2019**, the Region will file directly with the Board a motion for default judgment, seeking to have the Board deem the allegations to the complaint admitted as true based on your failure to file an appropriate answer. If the Board grants the Region's motion for default judgment, you will not get an opportunity to present your case at a hearing before an administrative law judge and the Board will order you to remedy the unfair labor practices without hearing from you.

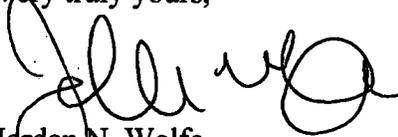
You must file the answer by mail, by courier, or by other service (or hand-delivery) so that we receive a paper copy of your answer by the deadline of **Friday, August 16, 2019**. You may also file electronically on the Board's website at <http://www.nlr.gov>. **You may not file your answer by fax or by email.** See Section 102.114 of the Board's Rules and Regulations.

American Postal Workers Union, AFL-CIO, - 2 -
LOCAL 1901 (United States Postal Service)
Case 10-CB-231385

August 8, 2019

We are providing you with a sample answer to complaint as well as another copy of the Complaint. If you should need another copy of any of these documents, please contact me at 336-582-7145.

Very truly yours,

A handwritten signature in black ink, appearing to read "Jordan N. Wolfe". The signature is fluid and cursive, with the first name "Jordan" being the most prominent part.

Jordan N. Wolfe
Field Attorney

Enclosed

10. Denied.

11. Denied.

FIRST AFFIRMATIVE DEFENSE

Respondent denies every allegation of the Complaint not expressly admitted, denied or qualified.

[REDACTED]

[REDACTED] Respondent requests that the Complaint and the underlying charges be dismissed in their entirety.

DATED this [REDACTED]

Respectfully submitted,

[REDACTED]

CERTIFICATE OF SERVICE

The undersigned hereby certifies that copies of the foregoing Answer to the Complaint and Notice of Hearing were sent this [REDACTED], as follows:

Scott C. Thompson, Officer-in-Charge, Subregion 11
Claude T. Harrell, Regional Director
NLRB, Region 10
4035 University Parkway, Suite 200
Winston-Salem, NC 27106-3275

Via E-Filing

[REDACTED]

Via Reg. Mail

[REDACTED]

**UNITED STATES OF AMERICA
BEFORE THE NATIONAL LABOR RELATIONS BOARD
REGION 10, SUBREGION 11**

**AMERICAN POSTAL WORKERS UNION, AFL –
CIO, LOCAL 1901 (UNITED STATES POSTAL
SERVICE)**

and

Case 10–CB–231385

ANTHOULA CONTOGIANNIS, an Individual

COMPLAINT AND NOTICE OF HEARING

This Complaint and Notice of Hearing is based on a charge filed by Anthoula Contogiannis, an individual. It is issued pursuant to Section 10(b) of the National Labor Relations Act, 29 U.S.C. § 151 et seq. (the Act), the Postal Reorganization Act, 39 U.S.C. § 101 et seq. (PRA), and Section 102.15 of the Rules and Regulations of the National Labor Relations Board (the Board) and alleges that American Postal Workers Union, AFL-CIO, Local 1901 (Respondent) has violated the Act as described below.

1.

Anthoula Contogiannis filed the charge in this proceeding on November 20, 2018, and a copy was served on Respondent by U.S. mail on the same date.

2.

The United States Postal Service (Postal Service) provides postal services for the United States and operates various facilities throughout the United States in performing that function, including its Post Office involved in this proceeding located at 201 Piedmont Street, Reidsville, North Carolina.

3.

The Board has jurisdiction over Respondent and this matter by virtue of Section 1209 of the PRA.

4.

(a) At all material times, Respondent has been a labor organization within the meaning of Section 2(5) of the Act.

(b) At all material times, American Postal Workers Union, AFL-CIO (the National Union) has been a labor organization within the meaning of Section 2(5) of the Act.

5.

At all material times, the following individuals held the positions set forth opposite their respective names and have been agents of Respondent within the meaning of Section 2(13) of the Act:

John Harris	—	President
Turnette Chestnut	—	Shop Steward

6.

At all material times, by virtue of Section 9(a) of the Act, the National Union has been the exclusive collective-bargaining representative of the following employees of the Postal Service (the Unit):

All employees in the bargaining unit for which each has been recognized and certified at the national level, including maintenance employees, motor vehicle employees, postal clerks, special delivery messengers, mail equipment shops employees, material distribution centers employees, and operating services and facilities services employees; and excluding managerial and supervisory personnel, professional employees, employees engaged in personnel work other than a purely non-confidential clerical capacity, security guards as defined in Public Law 91-375, 1201(2), all Postal Inspection Service employees, employees in the supplemental work

forces as defined in Article 7 of the Collective-Bargaining Agreement, rural letter carriers, mail handlers, and letter carriers.

7.

Since about July 20, 1971, and at all material times, the National Union has been the designated exclusive collective-bargaining representative of the Unit employed by the Postal Service and during that time, the National Union, and its affiliated locals on behalf of the National Union, including Respondent, have been recognized as such representative by the Postal Service.

8.

At all material times, the National Union and the Postal Service have maintained and enforced a collective-bargaining agreement covering the terms and conditions of employment of the Unit, including a grievance and arbitration procedure. That collective-bargaining agreement was effective on its face from May 21, 2015 through September 20, 2018. Prior to its expiration on September 20, 2018, the parties to the agreement extended the collective-bargaining agreement until agreement or interest arbitration on a successor contract.

9.

Since about September 11, 2018, Respondent has failed to process a grievance that Unit employee Anthoula Contogiannis filed or attempted to file under the provisions of the collective-bargaining agreement described above in paragraph 8, regarding her notice of removal and discharge from the Postal Service.

10.

On October 16, 2018, Anthoula Contogiannis requested in writing, via text message, that Respondent provide her with a copy of her grievance and the status of her grievance as described above in paragraph 9.

11.

Since September 11, 2018, Respondent has failed to keep Anthoula Contogiannis informed as to the status of her grievance as described above in paragraph 9.

12.

Since October 16, 2018, Respondent has failed and refused to provide Anthoula Contogiannis with a copy of her grievance and the status of her grievance as described above in paragraph 10.

13.

Respondent's conduct described above in paragraphs 9, 11, and 12 was arbitrary.

14.

By engaging in the conduct described above in paragraphs 9 and 11 through 13 in connection with its representative status described above in paragraphs 6 through 8, Respondent has failed to represent Anthoula Contogiannis for reasons that are arbitrary, discriminatory, or in bad faith and has breached the fiduciary duty it owes to this employee and to the Unit.

15.

By the conduct described above in paragraphs 9 and 11 through 14, Respondent has been restraining and coercing employees in the exercise of the rights guaranteed in Section 7 of the Act in violation of Section 8(b)(1)(A) of the Act and within the meaning of the PRA.

REMEDIES

As part of the remedy for the unfair labor practices alleged above in paragraphs 9 and 11 through 15, the General Counsel seeks an Order requiring that Respondent promptly request that the Postal Service reinstate Anthoula Contogiannis to her former position or, if the position no longer exists, to a substantially equivalent position. If the Postal Service refuses to reinstate Anthoula Contogiannis, the General Counsel seeks an Order requiring Respondent, among other things, to request that the Postal Service process a grievance over Anthoula Contogiannis' notice of removal and discharge, and to pursue the grievance in good faith with due diligence, including permitting Anthoula Contogiannis to have counsel or another representative of her own choosing present at the grievance-arbitration proceedings. If it is no longer possible for Respondent to pursue Anthoula Contogiannis' grievance concerning her notice of removal and discharge, and if the General Counsel of the Board shows in a subsequent compliance proceeding that a timely pursued grievance on these issues would have been successful, the General Counsel also requests that Respondent be ordered to make Anthoula Contogiannis whole for any loss of earnings and other benefits suffered as a result of her discharge on August 29, 2018, until such time as she is reinstated by the Postal Service or she obtains other substantially equivalent employment. The General Counsel further seeks all other relief as may be just and proper to remedy the unfair labor practices alleged.

ANSWER REQUIREMENT

Respondent is notified that, pursuant to Sections 102.20 and 102.21 of the Board's Rules and Regulations, it must file an answer to the complaint. The answer must be **received by this office on or before July 22, 2019, or postmarked on or before July 21, 2019.** Respondent should file an original and four copies of the answer with this office and serve a copy of the answer on each of the other parties.

An answer may also be filed electronically through the Agency's website. To file electronically, go to www.nlr.gov, click on **E-File Documents**, enter the NLRB Case Number, and follow the detailed instructions. The responsibility for the receipt and usability of the answer rests exclusively upon the sender. Unless notification on the Agency's website informs users that the Agency's E-Filing system is officially determined to be in technical failure because it is unable to receive documents for a continuous period of more than two hours after 12:00 noon (Eastern Time) on the due date for filing, a failure to timely file the answer will not be excused on the basis that the transmission could not be accomplished because the Agency's website was off-line or unavailable for some other reason. The Board's Rules and Regulations require that an answer be signed by counsel or non-attorney representative for represented parties or by the party if not represented. See Section 102.21. If the answer being filed electronically is a PDF document containing the required signature, no paper copies of the answer need to be transmitted to the Regional Office. However, if the electronic version of an answer to a complaint is not a PDF file containing the required signature, then the E-filing rules require that such answer containing the required signature continue to be submitted to the Regional Office by traditional means within three business days after the date of electronic filing. Service of the answer on each of the other parties must still be accomplished by means allowed under the Board's Rules and Regulations. The answer may not be filed by facsimile transmission. If no answer is filed,

or if an answer is filed untimely, the Board may find, pursuant to a Motion for Default Judgment, that the allegations in the complaint are true.

NOTICE OF HEARING

PLEASE TAKE NOTICE THAT on **September 4, 2019, at 10:00 a.m., in the Paris Favors Jr. Hearing Room located in the Subregion 11 Office of the National Labor Relations Board, 4035 University Parkway, Suite 200, Winston-Salem, North Carolina,** and on consecutive days thereafter until concluded, a hearing will be conducted before an administrative law judge of the National Labor Relations Board. At the hearing, Respondent and any other party to this proceeding have the right to appear and present testimony regarding the allegations in this complaint. The procedures to be followed at the hearing are described in the attached Form NLRB-4668. The procedure to request a postponement of the hearing is described in the attached Form NLRB-4338.

Dated: July 8, 2019

John D. Doyle
Regional Director
National Labor Relations Board
Region 10, By



Scott C. Thompson
Officer-in-Charge
National Labor Relations Board
Subregion 11
4035 University Pkwy Ste 200
Winston Salem, NC 27106-3275

Attachments

EXHIBIT 13

**UNITED STATES OF AMERICA
BEFORE THE NATIONAL LABOR RELATIONS BOARD
REGION 10, SUBREGION 11**

**AMERICAN POSTAL WORKERS UNION, AFL-
CIO, LOCAL 1901 (UNITED STATES POSTAL
SERVICE)**

and

Case 10-CB-231385

ANTHOULA CONTOGIANNIS, an Individual

AMENDMENT TO COMPLAINT

Pursuant to Section 102.17 of the Rules and Regulations of the National Labor Relations Board (the Board), the Complaint and Notice of Hearing that issued on July 8, 2019, is amended as follows:

I.

Delete paragraphs 10 and 12 of the Complaint, and substitute the following paragraphs as follows:

10.

Since September 11, 2018, Respondent has failed to keep Anthoula Contogiannis informed as to the status of her grievance as described above in paragraph 9.

11.

Respondent's conduct described above in paragraphs 9 and 10 was arbitrary.

12.

By engaging in the conduct described above in paragraphs 9 through 11 in connection with its representative status described above in paragraphs 6 through 8, Respondent has failed to represent Anthoula Contogiannis for reasons that are arbitrary, discriminatory, or in bad faith and has breached the fiduciary duty it owes to this employee and to the Unit.

13.

By the conduct described above in paragraphs 9 through 12, Respondent has been restraining and coercing employees in the exercise of the rights guaranteed in Section 7 of the Act in violation of Section 8(b)(1)(A) of the Act and within the meaning of the PRA.

REMEDIES

As part of the remedy for the unfair labor practices alleged above in paragraphs 9 through 13, the General Counsel seeks an Order requiring that Respondent promptly request that the Postal Service reinstate Anthoula Contogiannis to her former position or, if the position no longer exists, to a substantially equivalent position. If the Postal Service refuses to reinstate Anthoula Contogiannis, the General Counsel seeks an Order requiring Respondent, among other things, to request that the Postal Service process a grievance over Anthoula Contogiannis' notice of removal and discharge, and to pursue the grievance in good faith with due diligence, including permitting Anthoula Contogiannis to have counsel or another representative of her own choosing present at the grievance-arbitration proceedings. If it is no longer possible for Respondent to pursue Anthoula Contogiannis' grievance concerning her notice of removal and discharge, and if the General Counsel of the Board shows in a subsequent compliance proceeding that a timely pursued grievance on these issues would have been successful, the General Counsel also requests that Respondent be ordered to make Anthoula Contogiannis whole for any loss of earnings and other benefits suffered as a result of her discharge on August 29, 2018, until such time as she is reinstated by the Postal Service or she obtains other substantially equivalent employment. The General Counsel further seeks all other relief as may be just and proper to remedy the unfair

EXHIBIT 14

**UNITED STATES OF AMERICA
BEFORE THE NATIONAL LABOR RELATIONS BOARD
REGION 10, SUBREGION 11**

**AMERICAN POSTAL WORKERS UNION, AFL-CIO,
LOCAL 1901 (UNITED STATES POSTAL SERVICE)**

and

Case 10-CB-231385

ANTHOULA CONTOGIANNIS, an Individual

AFFIDAVIT OF SERVICE OF: Amendment to Complaint

I, the undersigned employee of the National Labor Relations Board, being duly sworn, say that on **August 20, 2019**, I served the above-entitled document(s) by **certified or regular mail**, as noted below, upon the following persons, addressed to them at the following addresses:

John Harris, President
American Postal Workers Union Local 1901
PO Box 104
Reidsville, NC 27320

**CERTIFIED MAIL, RETURN RECEIPT
REQUESTED**

John Harris, President
American Postal Workers Union Local 1901
201 Piedmont St
Reidsville, NC 27320-3869

**CERTIFIED MAIL, RETURN RECEIPT
REQUESTED**

Anthoula Contogiannis
5022 US Highway 220 N
Summerfield, NC 27358-9761

CERTIFIED MAIL

Amanda Hodges, Officer in Charge
United States Postal Service
201 Piedmont St
Reidsville, NC 27320-3869

FIRST CLASS MAIL

Roderick D. Eves, Deputy Managing Counsel
United States Postal Service
Law Department - NLRB Unit
1720 Market St Rm 2400
Saint Louis, MO 63155-9948

FIRST CLASS MAIL

August 20, 2019

Date

Kevin S. Crawford, Designated Agent of NLRB

Name

/s/ Kevin S. Crawford

Signature

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing Counsel for General Counsel's Motion to Transfer Case to the Board and for Default Judgment with attachments have this date been served by U.S. mail upon the following parties:

John Harris, President
American Postal Workers Union Local 1901
201 Piedmont Street
Reidsville, NC 27320

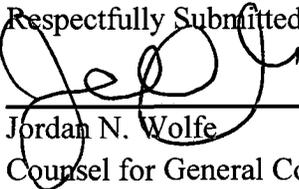
John Harris, President
American Postal Workers Union Local 1901
PO Box 104
Reidsville, NC 27320

Anthoula Contogiannis
5022 US Highway 220 N
Summerfield, NC 27358-9761

Roderick D. Eves, Deputy Managing Counsel
United States Postal Service
1720 Market St. Rm 2400, Law Department - NLRB Unit
Saint Louis, MO 63155-9948

Dated at Winston-Salem, North Carolina, August 22, 2019.

Respectfully Submitted,



Jordan N. Wolfe
Counsel for General Counsel
National Labor Relations Board
Subregion 11
4035 University Pkwy Ste 200
Winston Salem, NC 27106-3275