

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

**DAVID SAXE PRODUCTIONS, LLC and
V THEATER GROUP, LLC, Joint Employers**

and

**INTERNATIONAL ALLIANCE OF THEATRICAL
STAGE EMPLOYEES AND MOVING PICTURE
TECHNICIANS, ARTISTS, AND ALLIED
CRAFTS OF THE UNITED STATES AND
CANADA, LOCAL 720, AFL-CIO**

**Cases 28-CA-219225
28-CA-223339
28-CA-223362
28-CA-223376
28-CA-224119**

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Case 28-RC-219130

**COUNSEL FOR THE GENERAL COUNSEL’S CROSS-EXCEPTIONS
TO THE ADMINISTRATIVE LAW JUDGE’S DECISION**

Counsel for the General Counsel (General Counsel) files the following cross-exceptions set forth below to the decision issued by Administrative Law Judge Mara-Louise Anzalone (the ALJ) on August 27, 2019, JD(SF)-25-19 (the ALJD).

1. The General Counsel excepts to the ALJ’s failure to find that Respondents’ maintenance of an Email and Communications policy restricting the use of “[c]ustomized signature lines containing personalized quotes, personal agendas, solicitations, etc.” in its Employee Handbook violated Section

8(a)(1) of the Act, as alleged in paragraph 5(b)(1) of the Complaint.¹ ALJD 12:5-23.

2. The General Counsel excepts to the ALJ's failure to find that Respondents, by Thomas Estrada, Sr., promulgated and maintained an overly broad directive not to talk to their employees who supported the Union, in violation of Section 8(a)(1) of the Act, as alleged in paragraph 5(c)(iii) of the Complaint. ALJD 16:17-35.
3. The General Counsel excepts to the ALJ's failure to include in her recommended Order a broad order requiring Respondents to cease and desist from interfering with, restraining, or coercing employees in the exercise of their Section 7 rights "in any other manner," consistent with the finding in her decision that such relief is warranted in light of the egregiousness of Respondents' unfair labor practices. (ALJD 95:23-24)
4. The General Counsel excepts to the ALJ's use of an incorrect abbreviation of the Union's name in the Notice to Employees and Explanation of Rights. (ALJD 98:44; 98:49; 101:28)

¹ "Complaint" means the Order Further Consolidating Cases, Consolidated Complaint, and Notice of Hearing issued on August 20, 2018, as amended.

Dated at Albuquerque, New Mexico, this 29th day of October, 2019.

Respectfully submitted,

/s/ Rodolfo Martinez

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