

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

In the matter of:)	
)	
HORSESHOE BOSSIER CITY HOTEL AND CASINO)	
)	
Respondent,)	Case Nos. 15-CA-215656
)	15-CA-216517
)	15-CA-217795
and)	15-CA-217797
)	15-CA-218097
INTERNATIONAL UNION, UNITED AUTOMOBILE, AEROSPACE, & AGRICULTURAL IMPLEMENT WORKERS OF AMERICA (UAW),)	
)	
Union.)	

**ANSWERING BRIEF OF CHARGING PARTY TO EMPLOYER'S
PROPOSED AMENDED EXCEPTIONS**

Comes now the International Union, United Automobile, Aerospace, & Agricultural Implement Workers of America (“the Union”), and herein files its Answering Brief to the Proposed Amended Exceptions of Horseshoe Bossier City Hotel and Casino (“Horseshoe”):

On November 14, 2019, the Company filed its Reply Brief to the Answering Briefs of the Union and the General Counsel. Attached to its Reply Brief were Proposed Amended Exceptions. Horseshoe never filed a separate request for leave to submit Amended Exceptions, as required by 29 CFR §102.46(e), and the Board has not yet signaled any type of acceptance of Horseshoe’s Proposed Amended Exceptions. However, should the Board choose to accept Horseshoe’s Proposed Amended Exceptions, the Union in response incorporates herein by reference each of the Answers and arguments made in its original Answering Brief, submitted to the Board on October 31, 2019.

Respectfully submitted,

/s/ Samuel Morris

SAMUEL MORRIS
JESSICA B. WISEMAN
Counsel for Charging Party
GODWIN, MORRIS, LAURENZI &
BLOOMFIELD, P.C.
50 North Front Street, Suite 800
Memphis, TN 38103
Tel: 901.528.1702
Fax: 901.528.0246
Email: smorris@gmlblaw.com
jwiseman@gmlblaw.com

CERTIFICATE OF SERVICE

In addition to filing this Answering Brief of Charging Party to Employer's Exceptions via the NLRB's electronic filing system, I hereby certify that copies have been served this 27th day of November, 2019, by electronic mail, upon:

M. Kathleen McKinney
Regional Director
National Labor Relations Board
Region 15
600 South Maestri Place, 7th Floor
New Orleans, LA 70130
NLRBRegion15@nlrb.gov

Beauford Pines
Field Attorney
National Labor Relations Board
Region 15
600 South Maestri Place, 7th Floor
New Orleans, LA 70130
Beauford.pines@nlrb.gov

David Rose
Field Attorney
National Labor Relations Board
Region 15
80 Monroe Street, Suite 250
Memphis, TN 38103
David.rose@nlrb.gov

Paul T. Trimmer
Kelly R. Kichline
Jackson Lewis P.C.
300 S. Fourth Street
Ste. 900
Las Vegas, Nevada 89101
trimmerp@jacksonlewis.com

Ava Barbour
Associate General Counsel
International Union, United Automobile, Aerospace and Agricultural Implement Workers of
America (UAW), AFL-CIO
8000 East Jefferson Avenue
Detroit, MI 48214
abarbour@uaw.net

Jeffrey D. Sodko
Deputy General Counsel
International Union, United Automobile, Aerospace and Agricultural Implement Workers of
America (UAW), AFL-CIO
8000 East Jefferson Avenue
Detroit, MI 48214
jsodko@uaw.net

/s/ Jessica B. Wiseman
JESSICA B. WISEMAN