

**UNITED STATES OF AMERICA
BEFORE THE NATIONAL LABOR RELATIONS BOARD
REGION 13**

UNITE HERE LOCAL 1 (HILTON CHICAGO)

and

**Cases 13-CB-241768
13-CB-243057**

**NANCY HADDAD AND SULAIMAN MANSUR
ASIM, Individuals**

and

**HILTON MANAGEMENT, LLC D/B/A HILTON
CHICAGO**

**COUNSEL FOR THE GENERAL COUNSEL'S MOTION FOR APPROVAL OF NON-
BOARD SETTLEMENT AND DISMISSAL OF COMPLAINT IN 13-CB-241768**

A hearing was held before Administrative Law Judge David Goldman on the above-referenced matters in Chicago, Illinois on January 22 and 23, 2020.

As of January 27, 2020, Counsel for the General Counsel's Motion (unopposed by Respondent) is currently pending with the Division of Judges to withdraw Case 13-CB-243057 (concerning Charging Party Sulaiman Asim) in its entirety.

In Case 13-CB-241768 (concerning Charging Party Nancy Haddad), and pursuant to Section 102.24(a) of the Board's Rules and Regulations, Counsel for the General Counsel moves that the Administrative Law Judge approve the parties non-Board settlement, which is attached hereto as Exhibit A.

Respondent and Charging Party Haddad have agreed in writing that the non-Board settlement is acceptable as a full and final resolution of the outstanding allegation in Case 13-CB-241768. Moreover, Counsel for the General Counsel has reviewed the non-Board settlement and is satisfied that the non-Board settlement meets the factors outlined in *Independent Stave Co.*, 287 NLRB 740, 743 (1987) and should be approved by the judge. Counsel for the General Counsel does not object to the settlement.

Accordingly, Counsel for the General Counsel respectfully requests (and Respondent Union affirmatively joins in requesting) that the ALJ issue an Order approving the non-Board settlement and dismissing the complaint as to 13-CB-241768.

Dated at Chicago, Illinois this 31st day of January 2020.

/s/ Lisa Friedheim-Weis

Lisa Friedheim-Weis, Esq.

Counsel for the General Counsel

National Labor Relations Board

Region 13

Dirksen Federal Building

219 South Dearborn Street, Suite 808

Chicago, IL 60604-2027

**Non-Board Settlement
Case 13-CB-241768
UNITE HERE Local 1/Nancy Haddad**

As a non-Board resolution to this matter, Respondent Union will, upon the ALJ's approval of said settlement, forthwith send the following letter to Charging Party Nancy Haddad on Union letterhead by certified mail and email:

FEDERAL LAW GIVES YOU THE RIGHT TO:

- Form, join, or assist a union;
- Choose a representative to bargain with us on your behalf;
- Act together with other employees for your benefit and protection;
- Choose not to engage in any of these protected activities.

WE WILL NOT restrain or coerce you in the exercise of the above rights.

WE WILL NOT fail to communicate with you regarding the status of your grievances for arbitrary or perfunctory reasons.

WE WILL mail by certified mail and email a dated closing form to grievant Nancy Haddad, informing her of the status of her November 13, 2017 scheduling grievance.

UNITE HERE Local 1

Dated: _____

(Representative) (Title)

Exhibit A

CERTIFICATE OF SERVICE

The undersigned affirms that on January 31, 2020, the foregoing Counsel for the General Counsel's Motion For Approval Of Non-Board Settlement And Dismissal Of Complaint In Case 13-CB-241768 was served on the following parties below and in the following manner:

Via E-Filing:

Division of Judges

Via E-Mail:

ALJ David Goldman
David.goldman@nlrb.gov

Respondent Counsel Kristin Martin, Esq.
klm@msh.law

Charging Party Nancy Haddad
Nancyhaddad26@yahoo.com

/s/ Lisa Friedheim-Weis
Lisa Friedheim-Weis, Esq.
Counsel for the General Counsel
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Region 13 - Chicago