

DAVID A. ROSENFELD, Bar No. 058163
CAREN P. SENCER, Bar No. 233488
WEINBERG, ROGER & ROSENFELD
A Professional Corporation
1001 Marina Village Parkway, Suite 200
Alameda, California 94501
Telephone (510) 337-1001
Fax (510) 337-1023
E-Mail: drosenfeld@unioncounsel.net
csencer@unioncounsel.net

Attorneys for Proposed Intervenor,
COMMUNICATIONS WORKERS OF AMERICA, AFL-CIO

UNITED STATES OF AMERICA
NATIONAL LABOR RELATIONS BOARD

INTERNATIONAL UNION OF PAINTERS &
ALLIED TRADES, DISTRICT COUNCIL 16,
LOCAL 159, AFL-CIO,

Charging Party,

and

CAESARS ENTERTAINMENT D/B/A RIO
ALL-SUITES HOTEL AND CASINO,

Respondent.

and

COMMUNICATIONS WORKERS OF
AMERICA, AFL-CIO,

Proposed Intervenor.

Case 28-CA-060841

**REPLY TO GENERAL COUNSEL'S
OPPOSITION TO MOTION TO
INTERVENE AND FOR
RECONSIDERATION**

Contrary to Counsel for General Counsel, CWA has a direct interest because this case directly overruled a case in which it is a party, *Purple Communications, Inc.*, 365 NLRB No. 50 (2017). This distinguishes this from all of the arguments made by Counsel for General Counsel. The Motion to Intervene and for Reconsideration should be granted.

Dated: February 6, 2020

Respectfully submitted,

WEINBERG, ROGER & ROSENFELD
A Professional Corporation

By: /s/ David A. Rosenfeld
DAVID A. ROSENFELD
CAREN P. SENCER

Attorneys for Charging Party, INTERNATIONAL
UNION OF PAINTERS & ALLIED TRADES,
DISTRICT COUNCIL 16, Local 159,AFL-CIO

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PROOF OF SERVICE

I am a citizen of the United States and resident of the State of California. I am employed in the County of Alameda, State of California, in the office of a member of the bar of this Court, at whose direction this service was made. I am over the age of eighteen years and not a party to the within action.

On February 6, 2020, I served the following documents in the manner described below:

REPLY TO GENERAL COUNSEL’S OPPOSITION TO MOTION TO INTERVENE AND FOR RECONSIDERATION

- (BY ELECTRONIC SERVICE: By electronically mailing a true and correct copy through Weinberg, Roger & Rosenfeld’s electronic mail system from kkempler@unioncounsel.net to the email addresses set forth below.

On the following part(ies) in this action:

Larry A. Smith
Counsel for the General Counsel
National Labor Relations Board, Region 28
300 Las Vegas Boulevard South, Suite 2-901
Las Vegas, NV 89101
Larry.Smith@nlrb.gov

Lawrence D. Levien
Elizabeth A. Cyr Worrell
Elizabeth England
Akin, Gump, Strauss, Hauer & Feld, LLP
1333 New Hampshire Avenue, N.W.
Washington, DC 20036
llevien@akingump.com
eworrell@akingump.com
eengland@akingump.com

Mark J. Ricciardi
David B. Dornak
Fisher & Phillips LLP
300 S. Fourth Street, Suite 1500
Las Vegas, Nevada 89101
mricciardi@laborlawyers.com
ddornak@fisherphillips.com

Mr. David Habenstreit
Usha Dheenan
Appellate and Supreme Court Litigation
National Labor Relations Board
1015 Half Street, S.E.
Washington, DC 20003
(202) 273-3700
appellatecourt@nlrb.gov
usha.dheenan@nlrb.gov

James C. Crowley
Akin Gump Strauss Hauer & Feld LLP
2001 K Street N.W
Washington, DC 20006
jcrowley@akingump.com

Peter Robb
General Counsel
National Labor Relations Board
1015 Half Street S.E.
Washington, D.C. 20003
Peter.Robb@nlrb.gov

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on February 6, 2020, at Alameda, California.

/s/ Karen Kempler
Karen Kempler