

UNITED STATES OF AMERICA
BEFORE THE NATIONAL LABOR RELATIONS BOARD

TESLA, INC.,

Respondent,

and

MICHAEL SANCHEZ, an individual,
JONATHAN GALESCU, an individual,
RICHARD ORTIZ, an individual, and
INTERNATIONAL UNION, UNITED
AUTOMOBILE, AEROSPACE AND
AGRICULTURAL IMPLEMENT
WORKERS OF AMERICA, AFL-CIO, a
labor organization,

Charging Parties.

Case Nos. 32-CA-197020
32-CA-197058
32-CA-197091
32-CA-197197
32-CA-200530
32-CA-208614
32-CA-210879
32-CA-220777

**ANSWERING BRIEF OF CHARGING PARTIES
MICHAEL SANCHEZ, JONATHAN GALESCU, RICHARD ORTIZ, AND
INTERNATIONAL UNION, UNITED AUTOMOBILE, AEROSPACE AND
AGRICULTURAL IMPLEMENT WORKERS OF AMERICA, AFL-CIO IN SUPPORT
OF GENERAL COUNSEL'S LIMITED CROSS-EXCEPTIONS**

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AEROSPACE AND AGRICULTURAL
IMPLEMENT WORKERS OF AMERICA,
AFL-CIO

Answering Brief of Charging Parties in Support of
General Counsel's Limited Cross-Exceptions

Pursuant to Section 102.46(d) of the Rules and Regulations of the National Labor Relations Board, Charging Parties file this Answering Brief in support of the General Counsel's limited cross-exceptions to ALJ Amita B. Tracy's September 27, 2019 Decision. Charging Parties join and support these cross-exceptions for the reasons stated in the General Counsel's Brief in Support of his Limited Cross-Exceptions.

DATED: February 19, 2020

SCHWARTZ, STEINSAPIR, DOHRMANN
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By 
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RICHARD ORTIZ, and INTERNATIONAL
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WORKERS OF AMERICA, AFL-CIO

1 **PROOF OF SERVICE BY ELECTRONIC MAIL**

2 Case No. 32-CA-197020 et al.

3 RENEE CARNES certifies as follows:

4 I am employed in the County of Los Angeles, State of California; I am over the age of
5 eighteen years and am not a party to this action; my business address is 6300 Wilshire
6 Boulevard, Suite 2000, Los Angeles, California 90048-5202. My electronic notification address
7 is rac@ssdslaw.com.

8 On February 19, 2020, I caused the foregoing document(s) described as: **ANSWERING
9 BRIEF OF CHARGING PARTIES MICHAEL SANCHEZ, JONATHAN GALESCU,
10 RICHARD ORTIZ, AND INTERNATIONAL UNION, UNITED AUTOMOBILE,
11 AEROSPACE AND AGRICULTURAL IMPLEMENT WORKERS OF AMERICA,
12 AFL-CIO IN SUPPORT OF GENERAL COUNSEL'S LIMITED CROSS-EXCEPTIONS**

13 be served by electronic mail upon the person(s) shown below,

14
15 Edris W.I. Rodriguez-Ritchie, Esq.
16 National Labor Relations Board, Region 32
17 1301 Clay Street, Suite 300N
18 Oakland, CA 94612-5224
19 e-mail: edris.rodriguezritchie@nlr.gov

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27 X **BY E-MAIL:** By transmitting a copy of the above-described document(s) via e-mail to
28 the individual(s) set forth above at the e-mail addressed indicated.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on February 19, 2020, at Los Angeles, California.


RENEE CARNES