

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

**T-MOBILE USA, INC.,  
Respondent**

**and**

**Case Nos.   14-CA-155249  
                  14-CA-158446  
                  14-CA-166164  
                  14-CA-162644**

**COMMUNICATIONS WORKERS  
OF AMERICA, AFL-CIO,  
Charging Party.**

**CHARGING PARTY CWA's RESPONSE to  
the BOARD's APRIL 2, 2020 ORDER TO SHOW CAUSE**

Charging Party Communications Workers of America, AFL-CIO (CWA), submits this response to the Order to Show Cause issued by the National Labor Relations Board (Board) on April 2, 2020. The Board ordered that, absent a showing of cause to the contrary, Complaint paragraphs 6 and 7(a) and (c) be remanded to the judge for a determination concerning whether application of the exception articulated by the Board in *Caesars Entertainment d/b/a Rio All-Suites Hotel & Casino*, 368 NLRB No. 143, slip op. at 8-9 (2019) is warranted, here, and, for this purpose, severed Complaint paragraphs 6 and 7(a) and (c) from the remainder of the Complaint allegations. CWA does not intend to offer additional evidence or argument concerning the *Caesars Entertainment* exception, and there is, therefore, no reason to remand Complaint paragraphs 6 and 7(a) and (c) to the judge. By taking this position, CWA does not intend to waive or withdraw, and is not waiving or withdrawing, the allegations asserted in those paragraphs.

Respectfully submitted,

By: /s/ Glenda L. Pittman  
Glenda L. Pittman

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### **CERTIFICATE OF SERVICE**

This is to certify service of the foregoing Charging Party CWA's Response to the Board's April 2, 2020 Order to Show Cause on the parties below by e-filing and e-mail on the 6<sup>th</sup> day of April, 2020, as follows:

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/s/ Glenda L. Pittman  
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