

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

**BS&B SAFETY SYSTEMS, L.L.C.**

**and**

**UNITED STEEL, PAPER AND FORESTRY,  
RUBBER, MANUFACTURING, ENERGY,  
ALLIED INDUSTRIAL AND SERVICE  
WORKERS INTERNATIONAL UNION,  
AFL-CIO/CLC**

**Cases 14-CA-249322  
14-CA-252717  
14-CA-252718**

**UNOPPOSED MOTION TO CORRECT EXHIBITS IN THE RECORD**

Pursuant to Section 102.24 of the Board's Rules and Regulations, as amended, the General Counsel files this Unopposed Motion to Correct Exhibits in the Record. On March 3-4, 2020, an administrative hearing was held in the above-referenced matter. On March 3, 2020, the General Counsel offered the Formal Papers, marked for identification as General Counsel's Exhibits 1(a) through 1(ee). Upon review of the formal exhibits, Respondent's Answer to the Consolidated Complaint, filed March 2, 2020, was not included in the Formal Papers. Respondent's Answer to the Consolidated Complaint is attached to this Motion and a copy has been provided to the Court Reporter; General Counsel moves Respondent's Answer be added to the record as General Counsel Exhibit 1(ff).

Also upon review of the formal exhibits, it was discovered that General Counsel Exhibit 6 was not fully redacted. The Court Reporter has a fully redacted copy of General Counsel Exhibit 6. General Counsel moves that General Counsel Exhibit 6 in the formal exhibits be replaced with the fully redacted copy.

Both Respondent and Charging Party have advised they do not object to the Motion.

Respectfully Submitted,

/s/ Rebecca Proctor

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**UNITED STATES OF AMERICA BEFORE THE NATIONAL LABOR  
RELATIONS BOARD  
SUBREGION 17**

**BS&B SAFETY SYSTEMS, LLC**

**And**

**Cases 14-CA-249322  
14-CA-252717  
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RUBBER, MANUFACTURING, ENERGY,  
ALLIED-INDUSTRIAL AND SERVICE  
WORKERS INTERNATIONAL UNION, AFL-CIO/CLC**

**ANSWER**

Comes now the Respondent, BS&B Safety Systems LLC (hereinafter “BS&B” or the “Company”) and within its allotted time, files this Answer to the allegations contained in the Complaint filed by the Regional Director in the above-styled case:

1. The allegations in Paragraphs 1 (a) - 1 (f) are admitted.
2. The allegations in Paragraphs 2(a) - 2(d) are admitted though it is noted that Respondent’s products are known in the industry and to the public as “pressure relief” devices.
3. The allegations in Paragraphs 3(a) - 3(b) are admitted.
4. (a) The allegations in Paragraphs 4(a) - 4(b) of the Complaint are admitted, except to note that the Engineering Manager’s name is Danny Hamra and that Misha Spalding’s position is now HR Manager.
5. The allegations in Paragraph 5 are denied.
6. The allegations in Paragraph 6 (b) are admitted. The allegations in Paragraphs 6 (a) and 6(c) are denied.
7. The allegations in Paragraph 7 are admitted.
8. The allegations in Paragraph 8 are denied.

9. The allegations in Paragraphs 9(a) and 9(b) are admitted. The allegations in Paragraphs 9(c), 9(d) and 9(e) are denied.

10. The allegations in Paragraph 10 are denied.

11. The allegations in Paragraph 11 are denied.

12. The allegations in Paragraph 12 are denied.

13. The allegations in Paragraph 13 are denied.

14. The allegations in Paragraph 14 are denied and any requested remedy should be denied.

WHEREFORE, having fully answered all allegations of this Complaint, Respondent BS&B Safety Systems, LLC respectfully requests that it be dismissed as to all counts and allegations.

Respectfully Submitted,

/s/ R. Mark Solano

R. Mark Solano

R. Mark Solano, PLLC

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## CERTIFICATE OF SERVICE

I hereby certify that the above Answer of the Respondent, BS&B Safety Systems, LLC, was e-filed on March 2, 2020 with copies served via email on the following:

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Date: 3/2/2020

/s/ R. Mark Solano

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