



United States Government
NATIONAL LABOR RELATIONS BOARD
Region Four
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Philadelphia, PA 19107

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July 15, 2020

Roxanne Rothschild
Executive Secretary
Office of the Executive Secretary
National Labor Relations Board
1015 Half Street SE
Washington, DC 20570-0001

Re: Ground Zero Foundation d/b/a
Academy for Creative Enrichment
Case 04-CA-245956

Dear Ms. Rothschild:

Enclosed is Counsel for the General Counsel's Supplement to Sworn Affidavit of Field Attorney David G. Rodriguez in the above-captioned case. Copies of the above have been served via email to the individuals listed below.

Very truly yours,

DAVID G. RODRIGUEZ
Counsel for the General Counsel

Enclosures:
Supplement to Sworn Affidavit

cc:
Lauren DeLuca, Esq., Connolly Gallagher, LLP
ldeluca@connollygallagher.com
Stefanie Hamill
stefanie.m.hamill@gmail.com

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

**GROUND ZERO FOUNDATION d/b/a
ACADEMY FOR CREATIVE ENRICHMENT**

and

Case 04-CA-245956

STEFANIE HAMILL, an Individual

SUPPLEMENT TO SWORN AFFIDAVIT

On May 8, 2020, I, the undersigned employee of the National Labor Relations Board, filed a Motion for Permission to File Late Answering Brief, along with a Sworn Affidavit summarizing the reasons for that late filing. On May 22, 2020, the Board issued an Order accepting the Answering Brief. My Sworn Affidavit included the following sentence: “My spouse is a full-time healthcare provider at a local hospital, so I am solely responsible for my children’s care and schooling during regular working hours when I am also performing my work duties.” I wrote this sentence with the assumption that it is commonly understood that healthcare providers at hospitals typically do not work a standard eight-hour per day, five-day per week schedule but instead work longer shifts fewer days per week (as was true of my spouse), such that it would be clear to the reader that I did not have sole responsibility for my children’s care and schooling every single workday, but only on the several workdays when my spouse’s work schedule necessitated it. On these days, my normal work schedule was disrupted, my stress level increased, and I lost any time I would normally use for reflection, all of which contributed to my failure to timely file the Answering Brief. I hope that the Board made its decision to accept the Answering Brief with this

understanding, but I write now out of an abundance of caution on the possibility that the Board held some other understanding.

To be clear, as I mentioned in my Sworn Affidavit, the pandemic contributed to my lateness in ways beyond adding new childcare responsibilities. Thus, I wrote: “Region Four’s Regional Office, where I am employed, has been closed”—meaning only, of course, not having staff physically present absent a special reason —“since March 16, 2020 due to the COVID-19 pandemic. Since that time, like all Board employees, I have been teleworking full time.” Although the Agency remained fully operational with staff teleworking, this transition was challenging and resulted in the loss of my usual, longstanding deadline-tracking methods, all of which also played a significant part in my filing late.

Dated: July 15, 2020

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "David G. Rodriguez", written in a cursive style.

DAVID G. RODRIGUEZ
Field Attorney
National Labor Relations Board, Fourth Region
100 Penn Square East, Suite 403
Philadelphia, Pennsylvania 19107