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UNITED STATES OF AMERICA
NATIONAL LABOR RELATIONS BOARD

VERIZON WIRELESS,)
)
Respondent.)
)
and)
)
COMMUNICATIONS WORKERS OF AMERICA,)
AFL-CIO,)
)
Charging Party.)
_____)

Case 02-CA-157403

VERIZON NEW YORK INC., EMPIRE
CITY SUBWAY COMPANY (LIMITED),
VERIZON AVENUE CORP., VERIZON
ADVANCED DATA INC., VERIZON
CORPORATE SERVICES CORP.,
VERIZON NEW ENGLAND INC.,
VERIZON SERVICES CORP. AND
VERIZON NEW JERSEY INC.,

Respondents

and

COMMUNICATIONS WORKERS OF
AMERICA (“CWA”),

Charging Party.

Case 02-CA-156761

VERIZON PENNSYLVANIA INC.,
VERIZON SERVICES CORP. AND
VERIZON CORPORATE SERVICES
CORP.,

Respondents

and

COMMUNICATIONS WORKERS OF
AMERICA, DISTRICT 2-13, AFL-CIO,
CLC,

Charging Party.

Case 04-CA-156043

VERIZON WASHINGTON, D.C. INC.,
VERIZON MARYLAND INC., VERIZON
VIRGINIA INC., VERIZON SERVICES
CORP., VERIZON ADVANCED DATA INC.,
VERIZON SOUTH INC. (VIRGINIA),
VERIZON CORPORATE SERVICES CORP.
AND VERIZON DELAWARE INC.,

Respondents

and

COMMUNICATIONS WORKERS OF
AMERICA, DISTRICT 2-13, AFL-CIO
CLC,

Charging Party.

Case 05-CA-156053

VERIZON CALIFORNIA, INC. AND)
 VERIZON FEDERAL INC., VERIZON)
 FLORIDA INC., VERIZON NORTH LLC,)
 VERIZON SOUTHWEST INC., VERIZON)
 CONNECTED SOLUTIONS INC., VERIZON)
 SELECT SERVICES INC. AND MCI)
 INTERNATIONAL, INC.,)
 Respondents,)
 And)
 COMMUNICATIONS WORKERS OF)
 AMERICA AFL-CIO, DISTRICT 9,)
 Charging Party)

Case 31-CA-161472

**MOTION TO STRIKE
VERIZON’S REPLY MEMORANDUM**

In this case, the Board issued a notice to show cause on June 24, 2020. The Charging Party and Respondent filed timely responses on July 8, 2020.

On July 22, 2020, 14 days later, Verizon filed a request with the Board to file a “Reply Instant in Support of the Company’s Response to the Board’s Notice to Show Cause.”

In less than 48 hours, the Executive Secretary issued an order accepting the filing of the reply. That gave the Charging Parties little chance to respond. In fact, it gave them no chance to respond. It is as though the Executive Secretary was reacting in an eager fashion to grant anything that this or any employer would request from the Board. In fact, that appears to be the pattern before this Board.

In any case, it is a denial of due process and there is nothing in the Board rules that authorizes a response. There is also nothing that authorizes a response 14 days later.

The Board should strike the reply or in the alternative grant the Charging Parties an

opportunity to file their own response to the response filed by Verizon to the notice to show cause.

Dated: August 3, 2020

Organize and Resist,

AMY YOUNG

LAURENCE GOODMAN
WILLIG, WILLIAMS & DAVIDSON

WEINBERG, ROGER & ROSENFELD
A Professional Corporation

By: /s/ David A. Rosenfeld
 DAVID A. ROSENFELD
 Attorneys for the Charging Parties

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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 the service was made. I am over the age of eighteen years and not a party to the within action.

On August 3, 2020, served the following documents in the manner described below:

MOTION TO STRIKE VERIZON'S REPLY MEMORANDUM

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

On the following part(ies) in this action:

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I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on August 3, 2020, at Alameda, California.

/s/ Lauren D. Arnold

Lauren D. Arnold