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18 *Attorneys for Amicus Curiae International Union*
19 *Operating Engineers Local 3*

20 UNITED STATES DISTRICT COURT
21 FOR THE DISTRICT OF NEVADA

22 VALERIE HARDY-MAHONEY, Regional
23 Director of the Thirty-Second Region of the
24 National Labor Relations Board, for and on
25 behalf of the National Labor Relations Board

26 Petitioner

27 v.

28 NEVADA GOLD MINES LLC DBA
NEVADA GOLD MINES

Respondent

and

NEWMONT USA LIMITED DBA
NEWMONT MINING CORP

Party-In-Interest

Case No. 3:20-cv-00331

DECLARATION OF EILEEN B.
GOLDSMITH

Date:

Time:

Judge: Hon. Larry Hicks

Declaration of Eileen B. Goldsmith
Case No. 3:20-CV-00331

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DECLARATION OF EILEEN B. GOLDSMITH

I, Eileen B. Goldsmith, hereby declare as follows:

1. I am an attorney at Altshuler Berzon LLP and one of the counsel of record (pro hac vice pending) in this matter for Amicus Curiae International Union Operating Engineers Local Union 3 (the "Union"). I am over the age of 18 and competent to testify, and make this declaration based upon personal knowledge of the facts stated herein.

2. The Union received the following documents from Party-in-Interest Newmont Mining Corp in response to the Union's information requests. The documents were transmitted to the Union in electronic format, and the electronic file names include the approximate dates of the documents:

A. "Nevada Joint Venture Frequently Asked Questions," dated April 3, 2019, file name 190403_NevadaSpecificQA - v8 - Wednesday April 3 Distribution.pdf, a true and correct copy of which is attached hereto as **Exhibit A.**

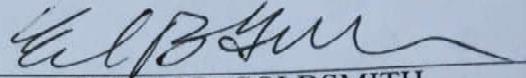
B. An email sent from Greg Walker to Nevada employees of Barrick Gold Corp. and Andrew Woodley of Newmont, dated April 12, 2019, file name 190414_GregWalkerMemo.pdf, a true and correct copy of which is attached hereto as **Exhibit B.**

C. "Nevada Gold Mines, LLC Employee Standards," dated approximately May 13, 2019, file name 190513_Nevada Gold Mines Employee Standards.pdf, a true and correct copy of which is attached hereto as **Exhibit C.**

D. "Welcome to Nevada Gold Mines, LLC HR Information Sessions," dated approximately May 15, 2019, file name 190515_JV Benefits Policy Presentation_May2019.pdf, a true and correct copy of which is attached hereto as **Exhibit D.**

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1 I declare under penalty of perjury under the laws of the United States that the foregoing is
2 true and correct. Executed this 2d day of July, 2020 in Oakland, California.
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5 EILEEN B. GOLDSMITH
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