

UNITED STATES OF AMERICA
BEFORE THE NATIONAL LABOR RELATIONS BOARD

In a Matter Between:)
)
NATIONAL NURSES ORGANIZING)
COMMITTEE- TEXAS/NATIONAL)
NURSES UNITED (BAY AREA)
HEALTHCARE GROUP, LTD. d/b/a) Case 16-CB-225123
CORPUS CHRISTI MEDICAL CENTER, an)
indirect subsidiary of HCA Holdings, Inc.)
Respondent,)
)
and)
)
ESTHER MARISSA ZAMORA, an Individual)
Charging Party.)
_____)

**RESPONDENT’S LIMITED CROSS-EXCEPTIONS TO
ADMINISTRATIVE LAW JUDGE’S DECISION**

NATIONAL NURSES ORGANIZING COMMITTEE/
NATIONAL NURSES UNITED (NNOC/NUU)
LEGAL DEPARTMENT
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Counsel for Respondent, NNOC – Texas/NUU

Pursuant to NLRB Rules and Regulations §102.46(c), Respondent (the “Union”), excepts to the following portions of the Administrative Law Judge Decision (“ALJD”) issued in JD-29-20 by the Administrative Law Judge (the “Judge”) on June 24, 2020, as follows. The Union separately files its brief in support of these limited cross-exceptions to the ALJD.

1. The Union excepts to the Judge’s finding that “there is a neutrality agreement between HCA Holdings and the Respondent or an affiliate of the Respondent[.]” (JD slip op. at 21-22:46-1).
2. The Union excepts to the Judge’s finding that “the Respondent, or a union affiliated with the Respondent, had entered into a ‘neutrality agreement’ with HCA Holdings, Inc., of which the Employer was an ‘indirect subsidiary.’” (JD slip op. at 4:35-36).

DATED: October 14, 2020

Respectfully submitted,

NATIONAL NURSES ORGANIZING COMMITTEE/
NATIONAL NURSES UNITED (NNOC/NNU)
LEGAL DEPARTMENT

/s/ Micah Berul

Micah Berul
Counsel for Respondent, NNOC-Texas/NNU

PROOF OF SERVICE

The undersigned hereby declares under penalty of perjury that I am a citizen of the United States, over the age of eighteen years, not a party to the within action and that my business address is 155 Grand Avenue, Oakland, California 94612.

On the date below, I served the foregoing document entitled

**RESPONDENT NATIONAL NURSES ORGANIZING COMMITTEE –
TEXAS/NATIONAL NURSES UNITED’S ANSWERING BRIEF TO GENERAL
COUNSEL’S EXCEPTIONS**

**RESPONDENT NATIONAL NURSES ORGANIZING COMMITTEE –
TEXAS/NATIONAL NURSES UNITED’S ANSWERING BRIEF TO CHARGING
PARTY’S EXCEPTIONS**

**RESPONDENT’S LIMITED CROSS EXCEPTIONS TO
ADMINISTRATIVE LAW JUDGE’S DECISION**

**RESPONDENT’S BRIEF IN SUPPORT OF CROSS-EXCEPTIONS
TO ADMINISTRATIVE LAW JUDGE’S DECISION**

via Electronic Mail as follows:

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I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on October 14, 2020, at Oakland, California.

/s/ Tym Tschneaux
Tym Tschneaux