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UNITED STATES OF AMERICA
BEFORE THE NATIONAL LABOR RELATIONS BOARD
REGION 19

MULTICARE HEALTH SYSTEM d/b/a
MULICARE DEACONESS HOSPITAL,

Employer,

v.

SEIU HEALTHCARE 1199NW,

Petitioner.

No. 19-RC-268298 and 19-RC-268341

MOTION FOR CONTINUANCE WITH
SUBJOINED DECLARATION OF
COUNSEL

Comes now the Employer, MultiCare Health System d/b/a/ MultiCare Deaconess Hospital, and moves the Regional Director for an order continuing the representation case hearing in this matter for one business day.

This motion is based on complications with the calendar of MultiCare's attorney in this matter, signing below. Specifically, counsel is also lead negotiator between MultiCare and the union representing the employees in a different bargaining unit. MultiCare and that union had already scheduled a day of collective bargaining on November 20, 2020. Even if it were feasible to reschedule collective bargaining on such short notice (which would be very difficult, in view of the size of the parties' bargaining committees), doing so would not be consistent with the purposes of the Act. November 20 is the last day currently scheduled for negotiations between

1 those parties, and the union is already making threats of a strike. See Subjoined Declaration of
2 Counsel and Exhibit A thereto.

3 The employer therefore respectfully requests that this hearing be continued by one
4 business day, to Monday, November 23, 2020.

5 Counsel for the Union in these cases has been contacted, and indicates that the Union
6 does not oppose a one business day continuance.
7

8 Respectfully submitted this 12th day of November, 2020.

9
10 STOEL RIVES LLP

11 

12 Timothy J. O'Connell, WSBA No. 15372
13 tim.oconnell@stoel.com

14 Attorneys for Employer
15

16
17 SUBJOINED DECLARATION OF COUNSEL

18 I, TIMOTHY J. O'CONNELL, declare and state:

19 1. I am a licensed attorney in the state of Washington and regularly practice before
20 the Board. I have been asked to represent the Employer in the above captioned cases.

21 2. I also represent MultiCare in other labor relations matters. One of those is the
22 ongoing negotiations with the Union of American Physicians and Dentists for a first collective
23 bargaining agreement, for a unit of health care providers in MultiCare's Indigo urgent care
24 centers. I am the lead negotiator in that bargaining. We are currently scheduled to bargain on
25 November 20, 2020. That bargaining date has been set for some time. No further bargaining
26

MOTION FOR CONTINUANCE - 2

1 dates are scheduled at this time. We anticipate that a mediator from FMCS will participate in the
2 bargaining session on November 20.

3 3. As is not uncommon with bargaining for a first collective bargaining agreement,
4 those negotiations have been going on for a substantial time. While MultiCare has been
5 bargaining in good faith, there are still a number of issues in dispute and the Union has started
6 making threats of a potential strike. Please see Exhibit A.
7

8 4. In the course of preparing this motion, I reached out to the attorney representing
9 SEIU Healthcare 1199NW. She has said that the Union does not oppose continuing the hearing
10 in this matter for one business day, to November 23, 2020.

11 SWORN under penalty of perjury under the laws of the United States and the state of
12 Washington.
13



14
15 Timothy J. O'Connell
16 Mercer Island, WA
17
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26

1 **CERTIFICATE OF SERVICE**

2
3 I, Debbie Dern, certify that at all times mentioned herein, I was and am a resident of the
4 state of Washington, over the age of eighteen years, not a party to the proceeding or interested
5 therein, and competent to be a witness therein. My business address is that of Stoel Rives LLP,
6 3600 One Union Square, 600 University Street, Seattle, Washington 98101.

7 On November 12, 2020, I caused a copy of the foregoing document to be served upon the
8 following individual(s) in the manner indicated below:

9 Ronald K. Hooks, Regional Director
10 National Labor Relations Board
11 Region 19
12 2948 Jackson Federal Building
13 915 Second Avenue
14 Seattle, WA 98174-1978

- hand delivery
- facsimile transmission
- overnight delivery
- first class mail
- e-filing delivery

15 Nestor Galindo
16 SEIU Healthcare 1199NW
17 15 S. Grady Way, Suite 200
18 Renton, WA 98057
19 Telephone: (425) 919-4131
20 Facsimile: (425) 917-9707
21 Email: nestorg@seiul199nw.org

- hand delivery
- facsimile transmission
- overnight delivery
- first class mail
- e-mail delivery

22 Laurel Webb
23 SEIU Healthcare 1199NW
24 15 S. Grady Way, Suite 200
25 Renton, WA 98057
26 Telephone: (425) 919-4131
Facsimile: (425) 917-9707
Email: LaurelW@seiul199nw.org

- hand delivery
- facsimile transmission
- overnight delivery
- first class mail
- e-mail delivery

Executed on November 12, 2020, at Seattle, Washington.

s/Debbie Dern
Debbie Dern

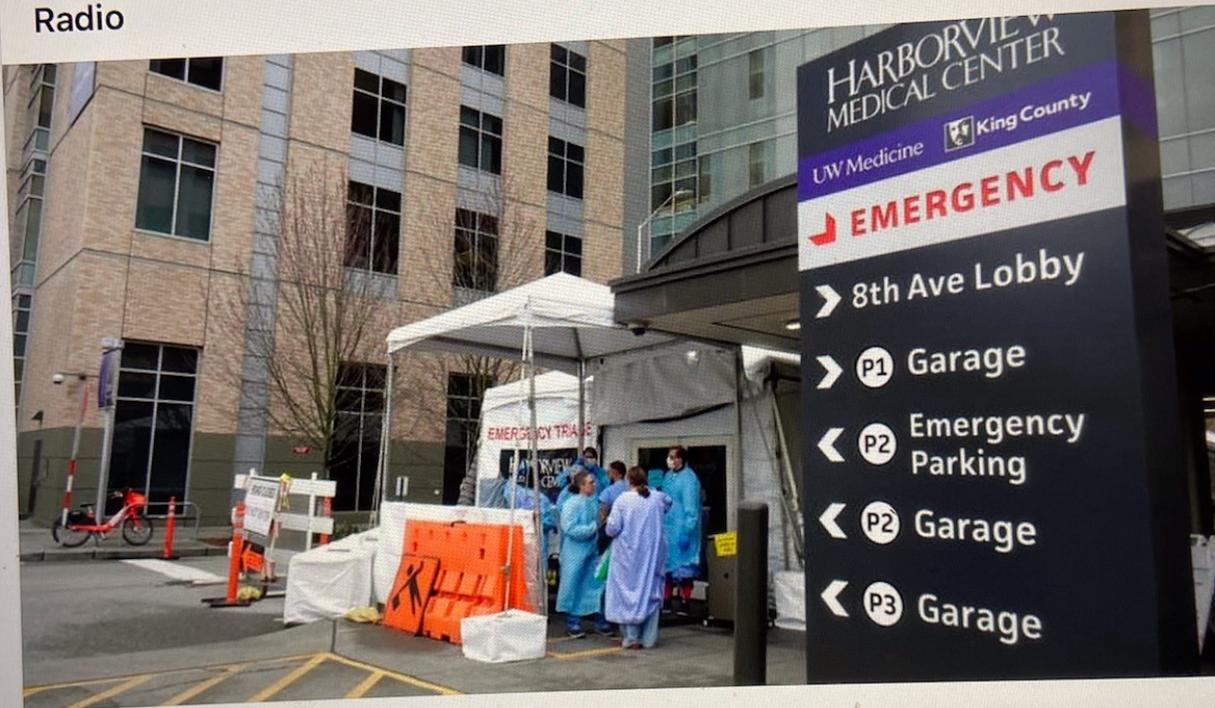
EXHIBIT A



Union of American Physicians and Dentists

2d · ⚙️

Is MultiCare Health System also ready for a strike? MultiCare Indigo Urgent Care doctors are prepared to strike, if necessary. KNKX Public Radio



KNKX.ORG

Hospitals in Washington state say they are prepared for a third surge of COVID-19
It's not a matter of if a third wave of the coronavirus will hit Washington state, but a ma

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