

**UNITED STATES OF AMERICA
BEFORE THE NATIONAL LABOR RELATIONS BOARD
REGION 6**

**PG PUBLISHING CO., INC. d/b/a
PITTSBURGH POST-GAZETTE**

and

Case 06-CA-233676

**GRAPHIC COMMUNICATIONS
INTERNATIONAL UNION,
GCC/INTERNATIONAL BROTHERHOOD
OF TEAMSTERS LOCAL 24M/9N**

**RESPONDENT'S OPPOSITION
TO MOTION OF COUNSEL FOR THE ACTING GENERAL COUNSEL
TO THE NATIONAL LABOR RELATIONS BOARD
FOR LEAVE TO FILE A SUPPLEMENTAL BRIEF**

On February 25, 2021, Counsel for the Acting General Counsel filed pursuant to Section 102.24¹ of the Board's Rules and Regulations a Motion of Counsel for the Acting General Counsel to the National Labor Relations Board for Leave to File a Supplemental Brief.

Respondent PG Publishing Co., Inc. d/b/a Pittsburgh Post-Gazette files this Opposition to Motion Of Counsel For The Acting General Counsel To The National Labor Relations Board For Leave To File A Supplemental Brief. Respondent opposes the Motion because the case has been fully briefed to the National Labor Relations Board. Counsel for General Counsel in its brief in support of exceptions fully briefed in the alternative the issues involving *Finley Hospital*, 362

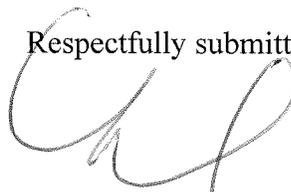
¹ Respondent PG Publishing Co., Inc. d/b/a Pittsburgh Post-Gazette believes the Counsel for the Acting General Counsel cites the incorrect Section of the Board's Rules and Regulations in support of the Motion as this case has been already transferred to the Board. The appropriate Section appears to be Section 102.47 of the Board's Rules and Regulations.

NLRB 915 (2015), *enf. Denied*, 827 F.3d 720 (8th Cir. 2016). Respondent filed a responsive brief to General Counsel's Brief in Support of Exceptions. In addition, Respondent filed Cross-Exceptions and Brief in Support of Cross Exceptions addressing the *Finley Hospital* issues and Counsel for General Counsel filed a responsive brief. The case has been fully briefed, and is ripe for decision by the Board. Counsel for the Acting General Counsel's Motion should be denied.

Should the Board grant the Counsel for the Acting General Counsel's Motion, Respondent should be allowed the opportunity to file a brief in response to any Supplemental brief.

Dated at Nashville, Tennessee
this 25th day of February 2021

Respectfully submitted,



Michael D. Oesterle
KING & BALLOW
315 Union Street, Suite 1100
Nashville, TN 37201
615-726-5496
(moesterle@kingballow.com)

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**AFFIDAVIT OF SERVICE OF Respondent's Opposition To Motion Of Counsel For The
Acting General Counsel To The National Labor Relations Board For Leave To File A
Supplemental Brief**

I, Michael D. Oesterle, on this 25th day of February 2021, served the above-entitled document(s) by **electronic mail** upon the following persons, addressed to them at the following addresses:

Clifford.Spungen@nlrb.gov
Clifford E. Spungen
Counsel for the Acting General Counsel
National Labor Relations Board, Region 6
1000 Liberty Avenue, Room 904
Pittsburgh, PA 15222

Emily.DeSa@nlrb.gov
Emily DeSa
National Labor Relations Board, Region 6
1000 Liberty Avenue, Room 904
Pittsburgh, PA 15222

jip@jpilaw.com
Joseph J. Pass, Esq.
Jubelirer, Pass & Intrieri P.C.
219 Fort Pitt Boulevard
Pittsburgh, PA 15222-1576

gciuchris@hotmail.com
Christopher V. Lang
Graphic Communications Conference/
International Brotherhood of Teamsters
Local 24M/9N
1629 Carmela Drive
Pittsburgh, PA 15227

rloew@kingballow.com
Richard C. Lowe, Esq.
King & Ballow
315 Union Street, Suite 1100
Nashville, TN 37201



Michael D. Oesterle