



UNITED STATES GOVERNMENT
NATIONAL LABOR RELATIONS BOARD

REGION 16
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Fort Worth, TX 76102-6107

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March 4, 2021

Roxanne Rothschild, Executive Secretary
Office of the Executive Secretary
National Labor Relations Board
1015 Half Street SE
Washington, DC 20570-0001

Re: National Nurses Organizing Committee-
Texas/National Nurses United (Bay Area
Healthcare Group, Ltd. d/b/a Corpus Christi
Medical Center an indirect subsidiary of
HCA Holdings, Inc.)
Case 16-CB-225123

Dear Ms. Rothschild:

Pursuant to §§102.24(c), 102.47 and/or 102.24(a) of the Board's Rules and Regulations, Counsel for the Acting General Counsel respectfully provides notice of intent to file a reply to the Charging Party's March 2, 2021 Opposition to the Acting General Counsel's Motion to Remand the Complaint to the Regional Director for Dismissal or, Alternatively, To Dismiss the Complaint ("Opposition"). The Charging Party's Opposition raises a number of arguments of nationwide importance, including, *inter alia*, the appropriateness of Acting General Counsel Peter Sung Ohr's appointment following the January 20, 2021 removal of former General Counsel Peter Robb. Counsel for the Acting General Counsel will file a reply brief to the Opposition by no later than March 16, 2021.

Counsel for the Acting General Counsel is aware, based on the Associate Executive Secretary's response(s) to the Acting General Counsel's request(s) for an extension of time in other matters involving similar filings such as *International Brotherhood of Electrical Workers, Local Union 98 (Fairfield Inn)*, Case 04-CC-223346, and *National Association of Broadcast Employees and Technicians (American Broadcasting Companies, Inc.)*, Cases 19-CB-244528 and 19-CB-247119, that the Executive Secretary's view is that a reply brief in these circumstances is not governed by §102.2(c), but by §§102.47 and 102.24(a) of the Board's Rules. The latter section does not provide a due date for a reply to an opposition to a motion, but states that replies must be filed "promptly and within such time as not to delay the proceeding." If this section applies, this is to notify you that Counsel for the General Counsel will file a reply brief promptly and certainly no later than March 16, 2021.

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Very truly yours,

/s/ Roberto Perez

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