

# LAW OFFICES OF TINAMARIE PAPPAS

ATTORNEY AND COUNSELOR

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March 2, 2010

**Via E-File**

Lester A. Heltzer, Executive Secretary  
National Labor Relations Board  
1099 14<sup>th</sup> Street, N.W.  
Washington, DC 20005-3419

Re: The American Red Cross  
Cases 7-CA-52033 et al.

Dear Mr. Heltzer:

I have enclosed for filing, Charging Union OPEIU Local 459's Response to Respondent's Motion to Dismiss in the above matters. Copies have been served on all counsel of record and the Regional Director, as set forth in the attached Proof of Service.

Thank you for your attention to this matter. Should you have any questions, please feel free to contact me.

Very truly yours,

s/ Tinamarie Pappas

Tinamarie Pappas  
Attorney for OPEIU Local 459

UNITED STATES OF AMERICA  
BEFORE THE NATIONAL LABOR RELATIONS BOARD  
DIVISION OF JUDGES

THE AMERICAN NATIONAL RED CROSS

Respondent

and

LOCAL 459, OFFICE AND PROFESSIONAL  
EMPLOYEES INTERNATIONAL UNION, AFL-CIO

CASES 7-CA-52033  
7-CA-52288  
7-CA-52544

Charging Union OPEIU

and

TEAMSTERS AND CHAUFFEURS LOCAL  
UNION NO. 580, INTERNATIONAL  
BROTHERHOOD OF TEAMSTERS

CASES 7-CA-52282  
7-CA-52308  
7-CA-52487

Charging Union Teamsters

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RESPONSE OF CHARGING UNION OPEIU LOCAL 459  
TO RESPONDENT'S MOTION TO DISMISS

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Charging Union OPEIU adopts in its entirety, Counsel for the General Counsel's  
February 24, 2010 response in opposition to Respondent's February 12, 2010 Motion to  
Dismiss.

Respectfully submitted this 2<sup>nd</sup> day of March 2010.

s/Tinamarie Pappas  
Tinamarie Pappas, Attorney for OPEIU Local 459  
Law Offices of Tinamarie Pappas  
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PROOF OF SERVICE

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TINAMARIE PAPPAS states that on March 2, 2010, she electronically filed Response of Charging Union OPEIU Local 459 to Respondent's Motion to Dismiss, with the NLRB Executive Secretary using the NLRB E-filing system, and that she electronically served copies of same on the Regional Director for Region Seven, and on counsel for the parties of record via email to the individuals and email addresses and/or fax number as set forth below:

Stephen Glasser, Regional Director  
NLRB Region Seven  
[Stephen.glasser@nrb.gov](mailto:Stephen.glasser@nrb.gov)

Fred Batten, Esq.  
Clark Hill PLC  
[fbatten@clarkhill.com](mailto:fbatten@clarkhill.com)

Wayne A. Rudell, Esq.  
Rudell & O'Neill, PC  
(No email) Sent via FAX  
(313) 359-1589

Michael J. Westcott, Esq.  
Axley Brynelson, LLP  
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Dynn Nick, Counsel for the General Counsel  
NLRB Region Seven  
Dynn.nick@nlrb.gov

The above statements are true and correct to the best of my knowledge, information and belief.

s/ Tinamarie Pappas