

UNITED STATES OF AMERICA
BEFORE THE NATIONAL LABOR RELATIONS BOARD

COMAU, INC.,

Respondent,

Case No. 7-CA-52106

-and-

AUTOMATED SYSTEMS WORKERS LOCAL 1123,
a Division of MICHIGAN REGIONAL COUNCIL OF
CARPENTERS, UNITED BROTHERHOOD OF
CARPENTERS AND JOINERS OF AMERICA,

Charging Party/Union,

Case No. 7-RD-3644

-and-

WILLIE RUSHING, an individual,

Petitioner.

**RESPONDENT'S ANSWER TO
COUNSEL FOR THE GENERAL COUNSEL'S
MOTION TO STRIKE PORTION OF RESPONDENT'S BRIEF IN SUPPORT OF
EXCEPTIONS TO THE ADMINISTRATIVE LAW JUDGE'S DECISION**

Counsel for the General Counsel, Sarah Pring Karpinen, has moved to strike footnote 20 of Respondent's Brief to the Board in support of its Exceptions, which appears on page 48 of Respondent's Brief. In footnote 20, Respondent Comau briefly summarized certain pertinent events following the mid-November 2009 hearing before the Administrative Law Judge:

- Comau's December 22, 2009 withdrawal of recognition of Charging Party ASW and its recognition of a successor representative, the Comau Employees Association (CEA), based on Comau's receipt of petitions signed by a clear majority of the unit employees;
- The execution of a new collective bargaining agreement by Comau and the CEA on May 14, 2010;
- The pendency of an unresolved NLRB charge filed by ASW (Case No. 7-CA-52614) challenging Comau's withdrawal of recognition of ASW and its recognition of the CEA; and
- That the decertification petition filed in April 2009 by Willie Rushing (Case No. 7-RD-3644) has remained blocked throughout this period by order of the Regional Director.

There is no doubt, as Comau acknowledged, that these documents and events that followed the mid-November 2009 hearing before the ALJ are not exhibits in or otherwise part of the official record in the instant case. Nor could they be. Nevertheless, Comau submits, striking footnote 20 would be meaningless and artificial. Counsel for the General Counsel relies on cases in which a party attempted to support its exceptions to an ALJ's decision with an affidavit detailing additional facts that were

not a matter of public record -- and should have been part of the official record in the case if they were to be considered. In the instant case, Comau has done no more than call to the Board's attention a few filings and events that are a matter of public record and thus indisputable public knowledge. The new and pending charge filed by ASW (Case No. 7-CA-52614) describes the withdrawal of recognition of ASW and the recognition of the CEA; this resulted in the Regional Director's issuance of a Complaint set for an ALJ hearing on August 31, 2010. A collective bargaining agreement has been executed by Comau and the CEA, and this is the subject of a further unresolved charge filed by ASW (Case No. 7-CA-52939). That the decertification petition filed in Case No. 7-RD-3644 remains blocked by order of the Regional Director is likewise a matter of public record. These are all part of the Board's own official files -- of which the Board can and should take administrative notice. To facilitate that process for the Board, Comau is attaching to this Answer copies of these official records from the Board's own files.¹

It is surprising that Ms. Karpinen would attempt to obscure this public information that has a clear relation to the instant case. After all, the Regional Director has indicated that he will attempt to use the instant charge as the predicate for continuing to deprive the affected unit employees of their free choice of collective bargaining representative. The new Complaint issued by the Regional Director on April 30, 2010 (in Case No. 7-CA-52614), scheduled to be heard on August 31, 2010, seeks to undo a

¹ It is noteworthy that, while Counsel for the General Counsel asserts in her motion that Comau's reference to these post-trial documents and events "prejudices the due process rights of the General Counsel and the Charging Party," she identifies no prejudice whatsoever. It is inconceivable that any legally cognizable "prejudice" could follow from simply pointing out what is publicly known and in the Board's own files.

formal request by a substantial majority of affected unit employees to have recognition withdrawn from ASW, and to instead recognize another legitimate (unaffiliated) labor organization, the CEA, which had previously represented these employees in essentially the same form (prior to affiliation with the Michigan Regional Council of Carpenters). That request by a majority of the employees was not furthered, let alone instigated, by any action of Comau -- and no claim is made in the new Complaint that it was. Undoubtedly, that approach by the employees resulted from the Regional Director's indefinite blocking of the April 2009 decertification petition on the theory that the health care plan at issue in the instant case, when it became effective on March 1, 2009 (having been announced and lawfully implemented in December 2008), caused employees to file that decertification petition.² Comau is informed that Counsel for the General Counsel will again contend at the hearing scheduled for August 31, 2010 (Case No. 7-CA-52614) that the new health care coverage commencing on March 1, 2009 caused the employees' December 2009 withdrawal-of-recognition petition as well.

Based on testimony received by the ALJ in the consolidated hearing in Case Nos. 7-CA-52106 and 7-RD-3644, Counsel for the General Counsel knows full well that the decertification petition was not brought about as a result of the disputed health care coverage. ASW's own representative testified that employees were split 50/50 as to the two alternative plans being discussed -- i.e., the insured plan proposed by ASW and the self-insured plan Comau had implemented. (TR 516). During the ALJ hearing, no witness assigned the March 1, 2009 commencement of coverage of the implemented plan as a factor for signing the decertification petition -- as the Regional Director would

² During the hearing before the ALJ in the instant case, the decertification petition -- which was signed by a majority of the unit employees -- was received as ALJ Exhibit 1.

have to show if the petition were “tainted” by that coverage. Instead, six of the ten witnesses who were called during this phase of the ALJ hearing testified that ASW’s oppressive dues structure, and its failure to fulfill its promise of finding building trades job opportunities for unit members, caused support for the decertification petition (TR pp. 529; 531; 571; 582; 592-593; 595-596; 604-605; 610-614). Five of the ten witnesses identified the cost of the health care plan as a factor, but made clear that the (concededly lawful) December 2008 announcement of the plan change caused them to feel this way -- not the coverage commencement date several months later. (TR pp. 548; 557-558; 560; 563-564; 574; 578-579; 585; 588-590). The mindset of all witnesses as to ASW representation was thus formed as a result of lawful factors, not the allegedly unlawful commencement of new health care coverage on March 1, 2009 (*id.*).

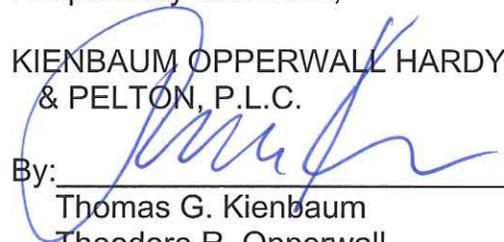
The Regional Director nevertheless indefinitely blocked the April 2009 decertification petition, and now wishes to yet again thwart these employees’ choice, and their Section 7 rights, by trying to invalidate their December 2009 withdrawal-of-recognition petition. The Board should have the full picture when it evaluates this case, including the facts that employees became so frustrated as to eventually request withdrawal of recognition of ASW by a substantial majority, and then, through their new representative (CEA), they bargained to agreement the very health care plan that had been implemented earlier.

It is noteworthy in this regard that Comau’s act of allowing coverage under the new plan to commence on March 1, 2009 was the only Section 8(a)(5) allegation found meritorious by the ALJ (all other bad-faith bargaining allegations were dismissed).

Counsel for the General Counsel is asking the Board to grant a motion that would strike public information that comes from the Board's own files. This gesture serves no purpose, and would promote an "ostrich-like" approach as the Board assesses Comau's Exceptions to the ALJ's decision. The motion to strike is not well-founded in this circumstance and should be denied.

Respectfully submitted,

KIENBAUM OPPERWALL HARDY
& PELTON, P.L.C.

By: 

Thomas G. Kienbaum

Theodore R. Opperwall

Attorneys for Respondent
280 North Old Woodward Avenue
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Birmingham, MI 48009
(248) 645-0000

Dated: July 29, 2010

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UNITED STATES OF AMERICA
BEFORE THE NATIONAL LABOR RELATIONS BOARD

COMAU, INC.,

Respondent,

Case No. 7-CA-52106

-and-

AUTOMATED SYSTEMS WORKERS LOCAL 1123,
a Division of MICHIGAN REGIONAL COUNCIL OF
CARPENTERS, UNITED BROTHERHOOD OF
CARPENTERS AND JOINERS OF AMERICA,

Charging Party/Union,

Case No. 7-RD-3644

-and-

WILLIE RUSHING, an individual,

Petitioner.

PROOF OF SERVICE

Pursuant to 28 U.S.C. §1746, I hereby certify under penalty of perjury that the following is true and correct: On July 29, 2010, I caused to be served via electronic mail a copy of **RESPONDENT'S ANSWER TO COUNSEL FOR THE GENERAL COUNSEL'S MOTION TO STRIKE PORTION OF RESPONDENT'S BRIEF IN SUPPORT OF EXCEPTIONS TO THE ADMINISTRATIVE LAW JUDGE'S DECISION** upon:

Sarah Pring Karpinen
Counsel for the General Counsel
National Labor Relations Board – Region 7
477 Michigan Avenue, Room 300
Detroit, MI 48226-2569
Sarah.Karpinen@nlrb.gov

Edward J. Pasternak
2000 Town Center, #2370
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Willie Rushing
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Jill A. Hall

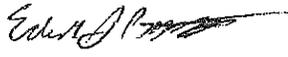
INTERNET
FORM NLRB-501
(2-08)UNITED STATES OF AMERICA
NATIONAL LABOR RELATIONS BOARD
CHARGE AGAINST EMPLOYER

DO NOT WRITE IN THIS SPACE

Case
7-CA-52614Date Filed
12-29-09

INSTRUCTIONS:

File an original with NLRB Regional Director for the region in which the alleged unfair labor practice occurred or is occurring.

1. EMPLOYER AGAINST WHOM CHARGE IS BROUGHT	
a. Name of Employer Comau, Inc.	b. Tel. No. (248) 645-6000 c. Cell No. f. Fax No. (248) 645-1385 g. e-Mail h. Number of workers employed 220+
d. Address (Street, city, state, and ZIP code) 21000 Telegraph Rd., Southfield, MI 48033	e. Employer Representative Thomas Kienbaum 280 N. Old Woodward Ave., Ste 400 Birmingham, MI 48009
i. Type of Establishment (factory, mine, wholesaler, etc.)	j. Identify principal product or service
k. The above-named employer has engaged in and is engaging in unfair labor practices within the meaning of section 8(a), subsections (1) and (list subsections) (5) _____ of the National Labor Relations Act, and these unfair labor practices are practices affecting commerce within the meaning of the Act, or these unfair labor practices are unfair practices affecting commerce within the meaning of the Act and the Postal Reorganization Act.	
2. Basis of the Charge (set forth a clear and concise statement of the facts constituting the alleged unfair labor practices) Employer has illegally withdrawn recognition from the Union on December 22, 2009. The Union requests 10(j) injunctive relief. To the extent the withdrawal is based on loss of majority status, the loss in support stems from Employer's misconduct set forth in Case No. 7-CA-52106.	
3. Full name of party filing charge (if labor organization, give full name, including local name and number) Automated Systems Workers Local No. 1123	
4a. Address (Street and number, city, state, and ZIP code) 23401 Mound Rd., Warren, MI 48091	4b. Tel. No. (586) 757-0780 4c. Cell No. 4d. Fax No. (586) 757-0376 4e. e-Mail
5. Full name of national or international labor organization of which it is an affiliate or constituent unit (to be filled in when charge is filed by a labor organization) United Brotherhood of Carpenters	
6. DECLARATION I declare that I have read the above charge and that the statements are true to the best of my knowledge and belief.	
By  (signature of representative or person making charge)	Edward J. Pasternak, Attorney (Print/type name and title or office, if any)
Address 2000 Town Center, Suite 2370, Southfield, MI 48075	Tel. No. (248) 354-0380 Office, if any, Cell No. Fax No. (248) 354-0393 e-Mail ejp@novaratesija.com
	12/29/09 (date)

WILLFUL FALSE STATEMENTS ON THIS CHARGE CAN BE PUNISHED BY FINE AND IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001)

PRIVACY ACT STATEMENT

Solicitation of the information on this form is authorized by the National Labor Relations Act (NLRA), 29 U.S.C. § 151 et seq. The principal use of the information is to assist the National Labor Relations Board (NLRB) in processing unfair labor practice and related proceedings or litigation. The routine uses for the information are fully set forth in the Federal Register, 71 Fed. Reg. 74942-43 (Dec. 13, 2006). The NLRB will further explain these uses upon request. Disclosure of this information to the NLRB is voluntary; however, failure to supply the information will cause the NLRB to decline to invoke its processes.

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

COMAU, INC.

Respondent

and

CASE 7-CA-52614

AUTOMATED SYSTEMS WORKERS LOCAL 1123,
A Division Of MICHIGAN REGIONAL COUNCIL OF
CARPENTERS, UNITED BROTHERHOOD OF
CARPENTERS AND JOINERS OF AMERICA

Charging Party

and

COMAU EMPLOYEES ASSOCIATION

Party in Interest

COMPLAINT AND NOTICE OF HEARING

The Charging Party has charged that Respondent has been engaging in unfair labor practices as set forth in the National Labor Relations Act, 29 U.S.C., Section 151. et seq. Based thereon, the General Counsel, by the undersigned, pursuant to Section 10(b) of the Act and Section 102.15 of the Rules and Regulations of the National Labor Relations Board, issues this Complaint and Notice of Hearing and alleges as follows:

1. (a) The original charge in this proceeding was filed by the Charging Party on December 29, 2009, and a copy was served by regular mail on Respondent on December 30, 2009.

(b) The amended charge in this proceeding was filed by the Charging Party on January 8, 2010, and a copy was served by regular mail on Respondent on January 11, 2010.

2. At all material times, Respondent, a corporation, with an office in Southfield, Michigan, and various plants in the metropolitan Detroit area, has been engaged in the design, sale, and installation of automated industrial systems.

3. During calendar year 2009, a representative period, Respondent, in conducting its business operations described in paragraph 2, derived gross revenues in excess of \$1,000,000, and sold goods and provided services valued in the aggregate in excess of \$50,000 from its metropolitan Detroit plants and offices directly to customers outside the State of Michigan.

4. At all material times, Respondent has been an employer engaged in commerce within the meaning of Section 2(2), (6), and (7) of the Act.

5. (a) From about 2001 to about March 2007, Automated Systems Workers, formerly known as PICO Employees Association, has been a labor organization within the meaning of Section 2(5) of the Act.

(b) At all material times since about March 2007, when Automated Systems Workers affiliated with the Michigan Regional Council of Carpenters, United Brotherhood of Carpenters and Joiners of America, the Charging Party has been a labor organization within the meaning of Section 2(5) of the Act.

6. At all material times, Comau Employees Association (hereinafter CEA), has been a labor organization within the meaning of Section 2(5) of the Act.

7. At all material times, the following individuals held the positions set forth opposite their names and have been supervisors of Respondent within the meaning of Section 2(11) of the Act and agents of Respondent within the meaning of Section 2(13) of the Act:

Fred Begle	Human Resources Director
Michael Bokor	Supervisor of Manufacturing
Thomas Kelly	Manager of Manufacturing

8. At all material times, Harry Yale, Nelson Burbo III, and James Reno have been agents of Respondent within the meaning of Section 2(13) of the Act.

9. The following employees of Respondent, herein called the Unit, constitute a unit appropriate for the purposes of collective bargaining within the meaning of Section 9(b) of the Act:

All full-time and regular part-time production and maintenance employees, inspectors, and field service employees employed by Respondent at and out of its facilities located at 20950, 21000, and 21175 Telegraph Road, Southfield, Michigan; and 42850 West Ten Mile Road, Novi, Michigan; and machinists currently working at its 44000 Grand River, Novi, Michigan, facility who formerly worked at its facility located at 21175 Telegraph Road, Southfield, Michigan; but excluding all office clerical employees, and guards and supervisors as defined in the Act.

10. Since about 2001 and about March 2007, each of Automated Systems Workers and the Charging Party, respectively, and successively, and at all material times,

has been the designated exclusive collective-bargaining representative of the Unit, and recognized as such representative by Respondent. This recognition has been embodied in successive collective-bargaining agreements, the most recent of which was effective from March 7, 2005, to March 2, 2008, and extended to December 22, 2008.

11. (a) At all times from about 2001 to about March 2007, based on Section 9(a) of the Act, Automated Systems Workers was the exclusive collective-bargaining representative of the Unit.

(b) At all times since about March 2007, based on Section 9(a) of the Act, the Charging Party has been the exclusive collective-bargaining representative of the Unit.

12. On about December 22, 2009, Respondent withdrew recognition from the Charging Party as the exclusive collective-bargaining representative of the Unit.

13. On about December 22, 2009, Respondent granted recognition to, and since then has continued to recognize, the CEA as the exclusive collective-bargaining representative of the Unit.

14. Respondent took the actions described in paragraph 13 at a time when the CEA did not represent an uncoerced majority of the Unit.

15. By the conduct described in paragraph 12, Respondent has been failing and refusing to bargain collectively and in good faith with the exclusive collective-bargaining representative of the Unit, in violation of Section 8(a)(1) and (5) of the Act.

16. By the conduct described in paragraphs 13 and 14, Respondent has been rendering unlawful assistance and support to a labor organization, in violation of Section 8(a)(1) and (2) of the Act.

17. The described unfair labor practices of Respondent affect commerce within the meaning of Section 2(6) and (7) of the Act.

WHEREFORE, it is prayed that Respondent be ordered to:

1. Cease and desist from:

(a) engaging in the conduct described in paragraph 12, or in any like or related manner failing and refusing to bargain collectively and in good faith with the Charging Party as the exclusive collective-bargaining representative of the Unit.

(b) engaging in the conduct described in paragraph 13 and 14, or in any like or related manner rendering unlawful assistance and support to a labor organization in violation of Section 8(a)(2) of the Act.

2. Take the following affirmative action:

(a) Recognize and offer to bargain, collectively and in good faith, with the Charging Party in regard to the wages, hours and other terms and conditions of employment of the Unit and, if an agreement is reached, upon request memorialize it in writing and execute it.

(b) Withdraw recognition from the CEA as the collective-bargaining representative of the Unit, and notify the Unit employees, in writing, that it has done so.

(c) Post appropriate notices.

The General Counsel further prays for such other relief as may be just and proper to remedy the unfair labor practices herein alleged.

ANSWER REQUIREMENT

Respondent is notified that, pursuant to Sections 102.20 and 102.21 of the Board's Rules and Regulations, it must file an answer to the complaint. The answer must be **received by this office on or before May 14, 2010, or postmarked on or before May 13, 2010.** Unless filed electronically in a pdf format, Respondent should file an original and four copies of the answer with this office.

An answer may also be filed electronically by using the E-Filing system on the Agency's website. In order to file an answer electronically, access the Agency's website at <http://www.nlr.gov>, click on the **E-Gov tab**, select **E-Filing**, and then follow the detailed instructions. The responsibility for the receipt and usability of the answer rests exclusively upon the sender. Unless notification on the Agency's website informs users that the Agency's E-Filing system is officially determined to be in technical failure because it is unable to receive documents for a continuous period of more than 2 hours after 12:00 noon (Eastern Time) on the due date for filing, a failure to timely file the answer will not be excused on the basis that the transmission could not be accomplished because the Agency's website was off-line or unavailable for some other reason. The Board's Rules and Regulations require that an answer be signed by counsel or non-attorney representative for represented parties or by the party if not represented. See Section 102.21. If the answer being filed electronically is a pdf document containing the required signature, no paper copies of the document need to be transmitted to the Regional Office. However, if the electronic version of an answer to a complaint is not a pdf file containing the required signature, then the E-filing rules require that such answer containing the required signature be submitted to the Regional Office by traditional means within three (3) business days after the date of electronic filing.

Service of the answer on each of the other parties must be accomplished in conformance with the requirements of Section 102.114 of the Board's Rules and Regulations. The answer may not be filed by facsimile transmission. If no answer is filed or if an answer is filed untimely, the Board may find, pursuant to Motion for Default Judgment, that the unanswered allegations in the complaint are true.

NOTICE OF HEARING

PLEASE TAKE NOTICE THAT on the 1st day of July 2010 at 10:00 a.m., and on consecutive days thereafter until concluded, at Room 300, Patrick V. McNamara Federal Building, 477 Michigan Avenue, Detroit, Michigan, a hearing will be conducted before an administrative law judge of the National Labor Relations Board. At the hearing, Respondent and any other party to this proceeding have the right to appear and present testimony regarding the allegations in this complaint. The procedures to be followed at the hearing are described in the attached Form NLRB-4668. The procedure to request a postponement of the hearing is described in the attached Form NLRB-4338.

Dated at Detroit, Michigan, this 30th day of April, 2010.

(SEAL)

/s/Stephen M. Glasser

Stephen M. Glasser, Regional Director
National Labor Relations Board, Region 7
Patrick V. McNamara Federal Building
477 Michigan Avenue, Room 300
Detroit, Michigan 48226

INTERNET
FORM NLRB-501
(2-00)

UNITED STATES OF AMERICA
NATIONAL LABOR RELATIONS BOARD
CHARGE AGAINST EMPLOYER

FORM EXEMPT UNDER 44 U.S.C 3512

DO NOT WRITE IN THIS SPACE	
Case 7-CA-052939	Date Filed 5-20-10

INSTRUCTIONS:

File an original with NLRB Regional Director for the region in which the alleged unfair labor practice occurred or is occurring.

1. EMPLOYER AGAINST WHOM CHARGE IS BROUGHT	
a. Name of Employer Comau, Inc.	b. Tel. No. (248)645-6000
	c. Cell No.
	f. Fax No. (248)845-1385
d. Address (Street, city, state, and ZIP code) 21000 Telegraph, Southfield, MI 48033	e. Employer Representative Thomas Kienbaum 280 N. Old Woodward, Ste 400 Birmingham, MI 48009
	g. e-Mail
	h. Number of workers employed 220+
i. Type of Establishment (factory, mine, wholesaler, etc.) machine shop	j. Identify principal product or service industrial automation
k. The above-named employer has engaged in and is engaging in unfair labor practices within the meaning of section 8(a), subsections (1) and (1st subsections) (2) and (5) _____ of the National Labor Relations Act, and these unfair labor practices are practices affecting commerce within the meaning of the Act, or these unfair labor practices are unfair practices affecting commerce within the meaning of the Act and the Postal Reorganization Act.	
2. Basis of the Charge (set forth a clear and concise statement of the facts constituting the alleged unfair labor practices) Employer made unilateral changes to its contract with Automated Systems Workers Local 1123 by negotiating a collective bargaining agreement with Comau Employees Association. Employer also unlawfully threatened employees with discharge for failure to sign checkoff authorizations with Comau Employees Association.	
3. Full name of party filing charge (if labor organization, give full name, including local name and number) Automated Systems Workers Local 1123	
4a. Address (Street and number, city, state, and ZIP code) 23401 Mound Road, Warren, MI 48091	4b. Tel. No. (586) 757-0780
	4c. Cell No.
	4d. Fax No. (586) 757-0376
	4e. e-Mail
5. Full name of national or international labor organization of which it is an affiliate or constituent unit (to be filled in when charge is filed by a labor organization) United Brotherhood of Carpenters	
6. DECLARATION	
I declare that I have read the above charge and that the statements are true to the best of my knowledge and belief.	
By <u>Edwin J. [Signature]</u> (signature of representative or person making charge)	Attorney (Print type name and title or office, if any)
	Tel. No. (248) 354-0380
	Office, if any, Cell No.
	Fax No. (248) 354-0383
	e-Mail
Address 2000 Town Center, Suite 2370	5/20/10 (date)

WILLFUL FALSE STATEMENTS ON THIS CHARGE CAN BE PUNISHED BY FINE AND IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001)

PRIVACY ACT STATEMENT

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From: Karpinen, Sarah [mailto:Sarah.Karpinen@nlrb.gov]
Sent: Monday, November 30, 2009 3:28 PM
To: Theodore Opperwall; ejp@novaratesija.com; wrushing259757@comcast.net
Subject: Briefs in St. Gobain portion of Comau case

Gentlemen,

In response to your inquiries about when briefs to the Regional Director will be due in 7-RD-3644 (the part of the case addressing the decertification petition), the Regional Director will issue an order asking for briefs to be submitted after the Board decision in the unfair labor practice portion of the case issues. In a previous case, Tecumseh Products (Cases 7-RD-3544 and 7-CA-49861), the briefs were due 2 weeks after the Regional Director's order issued. If you have any questions, please let me know.

Sarah Pring Karpinen
Region 7, National Labor Relations Board
477 Michigan Avenue, Room 300
Detroit, Michigan 48226
T: (313) 226-3229
F: (313) 226-2090