

**UNITED STATES OF AMERICA
BEFORE THE NATIONAL LABOR RELATIONS BOARD
Washington, D.C.**

SOUTHERN CALIFORNIA PERMANENTE MEDICAL
GROUP; and KAISER FOUNDATION HOSPITALS

and

Case 21-CA-39296

NATIONAL UNION OF HEALTHCARE WORKERS

**COUNSEL FOR THE ACTING GENERAL COUNSEL'S REPLY BRIEF TO
RESPONDENTS' RESPONSE TO THE ACTING GENERAL COUNSEL'S
LIMITED EXCEPTION**

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Facts:

1. On January 24, 2011, Counsel for the Acting General Counsel (herein General Counsel) filed with the Board a Limited Exception to the ALJ's Decision. This Limited Exception involves an error in the unit description for the HCP unit.

2. On February 7, 2011, Respondents filed a *Response* to the General Counsel's Limited Exception, informing the Board therein that Respondents did not oppose the General Counsel's Limited Exception; that Respondents were not filing exceptions or cross-exceptions; and that in light of this, Respondents were urging the Board to issue a Decision and Order in this case as soon as possible.¹

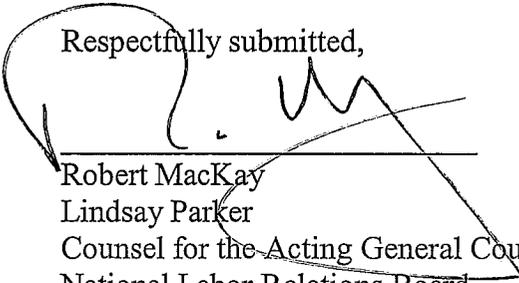
3. Also on February 7, 2011, the Charging Party (National Union of Healthcare Workers) filed a brief with the Board, stating therein that it agreed with the Acting General Counsel's Limited Exception; and that it also agreed with Respondents' request for an expeditious Decision and Order. The Charging Party did not file exceptions or cross-exceptions.

¹ The *Response* also sets forth Respondents' version of communications between the parties, as well as Respondents' opinions about the ALJ's decision. However, in the absence of exceptions or cross-exceptions from Respondents, these statements are irrelevant, and therefore should not distract or delay the Board from issuing its Decision and Order in this case.

Argument:

4. For the reasons described above in paragraphs 2 and 3, and because this case also involves the issuance of injunctive relief, the General Counsel joins in Respondents' and the Charging Party's requests that the Board issue its Decision and Order in this matter as expeditiously as possible.

Respectfully submitted,



Robert MacKay
Lindsay Parker
Counsel for the Acting General Counsel
National Labor Relations Board
Region 21

DATED at Los Angeles, California, this 8th day of February, 2011.

STATEMENT OF SERVICE

I hereby certify that a copy of **Counsel for the Acting General Counsel's Reply Brief to Respondents' Response to the Acting General Counsel's Limited Exception** was submitted for E-filing to the Executive Secretary of the National Labor Relations Board on February 8, 2011.

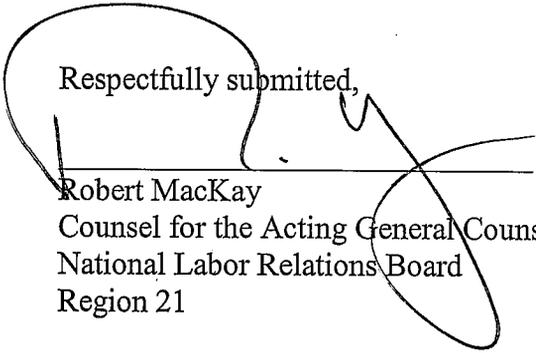
The following parties were served with a copy of said document by electronic mail on February 8, 2011.

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Respectfully submitted,



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Dated at Los Angeles, California, this 8th day of February, 2011.