

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

**SAN MIGUEL HOSPITAL CORP. d/b/a  
ALTA VISTA REGIONAL HOSPITAL  
HOME**

**and**

**Cases 28-CA-21896  
28-RC-6518**

**DISTRICT 1199NM, NATIONAL UNION  
OF HOSPITAL AND HEALTHCARE  
EMPLOYEES**

**ACTING GENERAL COUNSEL'S MOTION TO SUPPLEMENT  
MOTION FOR SUMMARY JUDGMENT AND RECORD**

Pursuant to Section 102.24(a) of the Board's Rules and Regulations, Counsel for the Acting General Counsel (General Counsel) files this Motion To Supplement Motion for Summary Judgment and Record (Motion). The General Counsel is seeking to supplement his summary judgment motion and update the record in this matter in response to the Board's recent Decision to issue a new Certification of Representative in Case 28-RC-6518 and Notice to Show Cause order as to why the Board should not grant General Counsel's Motion for Summary Judgment in Case 28-CA-21896. Specifically, the General Counsel seeks to add the following documents as exhibits to its Motion for Summary Judgment:

1. Amended Complaint and Notice of Hearing in Case 28-CA-21896 and its accompanying exhibits dated February 14, 2011; and
2. Respondent's Answer to Amended Complaint and Notice of Hearing dated February 28, 2011.

General Counsel submits that granting the Motion will allow the Board and reviewing courts to have a full and complete record in light of the Board's recent order recertifying the Charging Party as exclusive collective-bargaining representative of certain employees of Respondent.

## **I. BACKGROUND**

### **A. History of representation petition filed in Case 28-RC-6518**

On April 10, 2007, the Charging Party filed a petition in Case 28-RC-6518 seeking to represent certain professional and nonprofessional employees employed by Respondent. On May 25, 2007, the Regional Director of Region 28 issued a Decision and Direction of Election ordering an election among the two groups of Respondent's employees constituting voting groups found appropriate for collective bargaining. The election was conducted on June 21, 22, and 23, 2007. The final tally of ballots for the election reflected that a majority of the votes cast in the voting units were cast for the Charging Party in a self-determined combined unit of professional and nonprofessional employees. An earlier request for review filed by Respondent was denied by a three-member panel of the Board on August 2, 2007. On August 16, 2007, pursuant to objections related to the election filed by Respondent, a hearing was held on September 19, 2007. On November 2, 2007, the Hearing Officer issued a report overruling Respondent's objections. On November 26, 2007, Respondent filed Exceptions to the Hearing Officer's Report on Objections. On March 4, 2008, the two sitting members of the Board issued a Decision and Certification of Representative in Case 28-RC-6518.

### **B. Respondent's attempts to test the validity of certification of representative**

On May 15, 2008, based on a charge filed by the Charging Party, a Complaint and Notice of Hearing issued in Case 28-CA-21896 alleging Respondent violated Section 8(a)(1) and (5) of the Act by failing and refusing to recognize and bargain with the Charging Party as the exclusive collective-bargaining representative of the unit found appropriate in Case 28-RC-6518. On May 30, 2008, General Counsel filed a Motion to Transfer and Continue

Matter Before the Board, To Strike, and For Summary Judgment. On June 30, 2008, the two sitting members of the Board issued a Decision and Order granting the General Counsel's Motion for Summary Judgment and found Respondent had not raised any representational issue that was properly litigable in the unfair labor practice proceeding.

**C. Challenges made by Respondent to certification and actions by the Board pursuant to the decision in *New Process Steel, L.P. v. NLRB*, 130 S.Ct. 2635 (2010)**

On July 14, 2008, Respondent filed a Petition for Review with the United States Court of Appeals for the District of Columbia, seeking to have the Court vacate the Certification of Representative in Case 28-RC-6518 and deny enforcement of the Board's Order in Case 28-CA-21896. On September 20, 2010, the Court granted the Petition for Review in accordance with the decision issued in *New Process Steel, L.P. v. NLRB*, 130 S.Ct. 2635 (2010), on the basis that the certification and the order were invalid because they had been issued by only two sitting members of the Board. On September 24, 2010, the Court remanded the cases to the Board for further proceedings consistent with the Supreme Court's *New Process Steel* decision.

On September 30, 2010, a three-member panel of the Board issued another Certification of Representation in Case 28-RC-6518 and a Notice to Show Cause as to why the Board should not grant General Counsel's Motion for Summary Judgment in Case 28-CA-21896. On December 14, 2010, the General Counsel filed a Motion Requesting Special Permission to Amend Complaint To Reflect the Board's Recent Certification and Charging Party's Renewed Request for Bargaining Pursuant to the New Certification. On February 7, 2011, the Board issued an Order granting General Counsel's motion, setting a deadline for General Counsel to issue an amended complaint no later than February 14, 2011.

On February 11, 2011, the Board issued a Revised Order adding to its previous order that any further responses to the Notice to Show Cause were due by March 7, 2011.

The Amended Complaint and Notice of Hearing (Amended Complaint) issued on February 14, 2011. A copy of this Amended Complaint is attached as Exhibit A. Included with the Amended Complaint was a new exhibit, a letter from the Charging Party sent to Respondent on December 10, 2010. This letter from the Charging Party requested Respondent bargain with the Charging Party as the exclusive collective-bargaining representative of certain employees of Respondent pursuant to the new certification. A copy of the December 10, 2010 letter from the Charging Party to Respondent is attached as Exhibit B. Respondent filed its Answer to the Amended Complaint on February 28, 2011. A copy of its Answer to the Amended Complaint is attached as Exhibit C.

## **II. DISCUSSION**

For the Board to issue a cogent, well-reasoned decision that a Court of Appeals will uphold, the Board's decision must be supported by substantial evidence on the record as a whole, and have a "reasonable basis in law." *NLRB v. Hearst Publications, Inc.*, 322 U.S. 111, 131 (1944). Substantial evidence is "more than a mere scintilla. It means such relevant evidence as a reasonable mind might accept as adequate to support a conclusion." *Universal Camera Corp. v. NLRB*, 340 U.S. 474, 477, (1951) (quoting *Consolidated Edison Co. v. NLRB*, 305 U.S. 197, 229 (1938)).

Here, the General Counsel offers Exhibits A through C to augment the record to more accurately reflect the case activity that has occurred since the Board issued the Certification of Representative and Order and Notice to Show Cause on September 30, 2010. These documents, along with those already present in the record, show that Respondent refuses and

continues to refuse to bargain with the Charging Party despite numerous requests to do so pursuant to both the first Certification of Representative that issued by the Board on March 4, 2008, and the new one that issued on September 30, 2010. The General Counsel seeks to supplement and update its Motion for Summary Judgment and the underlying record so that the record before the Board regarding renewed requests and refusals to bargain can be complete. The documents were not originally included with the General Counsel's Motion for Summary Judgment because they did not exist at the time the Motion for Summary Judgment was filed on May 30, 2008. The General Counsel submits that granting the Motion will allow the Board and reviewing courts to have a full and complete record in light of the Board's recent order recertifying the Charging Party as exclusive collective-bargaining representative of the unit.

### **III. CONCLUSION**

Based on the foregoing, the General Counsel respectfully moves to supplement its Motion for Summary Judgment and the underlying record in this matter with attached Exhibits A through C in response to the Board's most recent Certification of Representation and Notice to Show Cause.

Dated at Albuquerque, New Mexico, this 4<sup>th</sup> day of March 2011.

/s/David T. Garza  
David T. Garza  
Counsel for the Acting General Counsel  
National Labor Relations Board  
421 Gold Avenue, Suite 310  
P.O. Box 567  
Albuquerque, New Mexico 87103-0567  
Telephone: (505) 248-5130  
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**UNITED STATES OF AMERICA  
BEFORE THE NATIONAL LABOR RELATIONS BOARD  
REGION 28**

**SAN MIGUEL HOSPITAL CORP. d/b/a  
ALTA VISTA REGIONAL HOSPITAL**

**and**

**Case 28-CA-21896**

**NATIONAL UNION OF HOSPITAL AND  
HEALTHCARE EMPLOYEES DISTRICT 1199NM**

**AMENDED COMPLAINT AND NOTICE OF HEARING**

Upon a charge filed by National Union of Hospital and Healthcare Employees District 1199NM, herein called the Union, a Complaint and Notice of Hearing issued on May 15, 2008, against San Miguel Hospital Corp. d/b/a Alta Vista Regional Hospital, herein called the Respondent, alleging that it has been engaging in unfair labor practices as set forth in the National Labor Relations Act, 29 U.S.C. § 151, et. seq., herein called the Act. Based thereon the Acting 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, herein called the Board, issues this Amended Complaint and Notice of Hearing and alleges as follows:

1. The charge in this proceeding was filed by the Union on April 29, 2008, and a copy was served by regular mail on the Respondent on the same date.
2. (a) At all material times the Respondent, a New Mexico corporation, with an office and place of business in Las Vegas, New Mexico, herein called the Respondent's facility, has been engaged in the operation of an acute care hospital.

(b) During the 12-month period ending April 29, 2008, the Respondent, in conducting its business operations described above in paragraph 2(a), derived gross revenues in excess of \$250,000.

(c) During the 12-month period ending April 29, 2008, the Respondent, in conducting its business operations described above in paragraph 2(a), purchased and received at the Respondent's facility goods valued in excess of \$50,000 directly from points outside the State of New Mexico.

(d) At all material times the Respondent has been an employer engaged in commerce within the meaning of Section 2(2), (6), and (7) of the Act and a health care institution within the meaning of Section 2(14) of the Act.

3. At all material times the Union has been a labor organization within the meaning of Section 2(5) of the Act.

4. At all material times Richard Grogan held the position of the Respondent's Chief Executive Officer and has been a supervisor of the Respondent within the meaning of Section 2(11) of the Act and an agent of the Respondent within the meaning of Section 2(13) of the Act.

5. (a) The following employees of the 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 professional employees, including registered nurses, registered nurse rotating team leaders, registered nurse case manager, licensed practical nurse case manager, cardiac catheterization laboratory supervisors, medical technologists, nuclear medicine technicians, pharmacists, registered pharmacists, occupational therapists, physical therapists, registered respiratory therapists, speech pathologists, and other nonprofessional employees, including all technical employees, skilled maintenance

employees, business office employees, and other nonprofessional employees, and, per diem employees averaging four or more hours of work per week for the last quarter prior to the eligibility date, employed by the Respondent at its hospital located in Las Vegas, New Mexico; excluding all employees employed at clinics, physicians, registered nurse permanent team leaders, house supervisors, human resource assistants, executive assistants, medical staff coordinator, staffing coordinator, confidential employees, guards and supervisors as defined in the Act.

(b) On June 21 through June 23, 2007, a representation election was conducted among the employees in the Unit in which a majority of employees voted for representation by the Union.

(c) On March 4, 2008, the Union was certified by a two-member panel of the Board as the exclusive collective-bargaining representative of the Unit.

(d) On September 30, 2010, the Union was certified by a three-panel of the Board as the exclusive collective-bargaining representative of the Unit.

(e) At all times since June 23, 2007, based on Section 9(a) of the Act, the Union has been the exclusive collective-bargaining representative of the Unit.

6. (a) On March 11, 2008, the Union, by letter, requested that the Respondent recognize it as the exclusive collective-bargaining representative of the Unit and bargain collectively with the Union as the exclusive collective-bargaining representative of the Unit. A copy of the March 11, 2008 letter is appended hereto as Exhibit A.

(b) On or about March 12, 2008, the Respondent, by letter from Richard Grogan, advised the Union that in order to obtain court review of the Board's decision related to the conduct of the election, the Respondent was refusing to bargain with the Union. A copy of the March 12, 2008 letter is appended hereto as Exhibit B.

(c) On December 10, 2010, the Union, by letter, requested that the Respondent bargain collectively with the Union as the exclusive collective-bargaining representative of the Unit. A copy of the December 10, 2010 letter is appended hereto as Exhibit C.

(d) Since on or about December 10, 2010, the Respondent, has failed to respond to the Union's letter described in paragraph 6(c) above, and has refused to bargain with the Union.

(e) Since on or about March 12, 2008, and since on or about December 10, 2010, the Respondent has failed and refused to recognize and bargain with the Union as the exclusive collective-bargaining representative of the Unit.

7. By the conduct described above in paragraph 6, the Respondent has been failing and refusing to bargain collectively and in good faith with the exclusive collective-bargaining representative of its employees in violation of Section 8(a)(1) and (5) of the Act.

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

**ANSWER REQUIREMENT**

The 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 February 28, 2011, or postmarked on or before February 26, 2011.** Unless filed electronically in a pdf format, the 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 allegations in the complaint are true.

**NOTICE OF HEARING**

**PLEASE TAKE NOTICE** that on a date, time, and place to be later determined, a hearing will be conducted before an administrative law judge of the National Labor Relations Board. At the hearing, the 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 Phoenix, Arizona, this 14<sup>th</sup> day of February 2011.

  
Cornele A. Overstreet, Regional Director

Attachments

DISTRICT



National Union of Hospital and Health Care Employees  
AFSCME / AFL-CIO  
130 Alvarado Dr. NE • Suite 100  
Albuquerque, New Mexico 87108  
Phone: (505) 884-7713 • Fax: (505) 884-7667  
www.nmhospitalworkersunion.com



December 10, 2010

Mary Dell Acosta, CEO  
Alta Vista Hospital  
104 Legion Dr.  
Las Vegas, NM 87701

Dear Ms. Acosta,

Following the most recent NLRB decision certifying District 1199NM as the collective bargaining agent for Alta Vista Hospital, District 1199NM demands that bargaining begins immediately. Please notify us of potential dates for negotiations.

Sincerely,

Fonda Osborn, District President  
130 Alvarado Dr. NE  
Albuquerque, NM 87108

UNITED STATES OF AMERICA  
BEFORE THE NATIONAL LABOR RELATIONS BOARD  
REGION 28

-----X  
In the Matter of :  
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SAN MIGUEL HOSPITAL CORP. d/b/a :  
ALTA VISTA REGIONAL HOSPITAL :  
 :  
and : Case No. 28 - CA - 21896  
 :  
 :  
NATIONAL UNION OF HOSPITAL AND :  
HEALTHCARE EMPLOYEES DISTRICT 1199NM :  
-----X

**ANSWER TO AMENDED COMPLAINT**

SAN MIGUEL HOSPITAL CORP. d/b/a ALTA VISTA REGIONAL HOSPITAL

(the "Respondent"), by its attorney, Don T. Carmody, Esq., in answer to the Amended Complaint issued in the above-captioned matter on February 14, 2011 (the "Complaint"), by Cornele A. Overstreet, the Regional Director for Region 28 of the National Labor Relations Board (the "Board"), avers as follows:

(1) The Respondent denies knowledge and information sufficient to form a belief as to the truth of the allegations set forth in Paragraph (1) of the Complaint.

(2) (a) The Respondent admits each and every allegation set forth in Paragraph (2) (a) of the Complaint.

(b) The Respondent admits each and every allegation set forth in Paragraph (2) (b) of the Complaint.

(c) The Respondent admits each and every allegation set forth in Paragraph (2) (c) of the Complaint.

(d) The Respondent admits each and every allegation set forth in Paragraph (2) (d) of the Complaint.

(3) The Respondent admits each and every allegation set forth in Paragraph (3) of the Complaint.

(4) The Respondent admits the allegations set forth in Paragraph (4) of the Complaint, except denies that Richard Grogan held the position of Respondent's Chief Executive Officer at the material time alleged in Paragraphs (6) (c), (d) and (e) of the Complaint.

(5) (a) The Respondent denies each and every allegation set forth in Paragraph (5) (a) of the Complaint.

(b) The Respondent, without prejudice to the averments set forth in Paragraph (5) (a), above, admits that on June 21 through 23, 2007, as alleged in Paragraph (5) (b) of the Complaint, a representation election was conducted among the employees described in Paragraph (5) (a) of the Complaint in which a majority of the employees voted for representation by the Union.

(c) The Respondent, without prejudice to the averments set forth in Paragraph (5) (a), above, admits that on March 4, 2008, the Union, as alleged in Paragraph (5) (c) of the Complaint, was certified by a "two-member panel of the Board" as the exclusive collective bargaining representative of the employees described in Paragraph (5) (a) of the Complaint.

(d) The Respondent, without prejudice to the averments set forth in Paragraph (5) (a), above, admits that on September 30, 2010, the Union, as alleged in Paragraph (5) (d) of the Complaint, was certified by a "three (sic) panel of the Board" as the exclusive collective bargaining representative of the employees described in Paragraph (5) (a) of the Complaint.

(e) The Respondent, consistent with the averments set forth in Paragraph (5) (a), above, denies each and every allegation set forth in Paragraph (5) (e) of the Complaint.

(6) (a) The Respondent, consistent with the averments set forth in Paragraph (5) (a), above, respectfully refers the Board to the correspondence attached to the Complaint as “Exhibit A” rather than admitting or denying the allegations set forth in Paragraph (6) (a) of the Complaint.

(b) The Respondent, consistent with the averments set forth in Paragraph (5) (a), above, respectfully refers the Board to the correspondence attached to the Complaint as “Exhibit B” rather than admitting or denying the allegations set forth in Paragraph (6) (b) of the Complaint.

(c) The Respondent, consistent with the averments set forth in Paragraph (5) (a), above, respectfully refers the Board to the correspondence attached to the Complaint as “Exhibit C” rather than admitting or denying the allegations set forth in Paragraph (6) (c) of the Complaint.

(d) The Respondent, without prejudice to and consistent with the averments set forth in Paragraph (5) (a), above, and Paragraphs (6) (a), (b) and (c), above, admits the allegations set forth in Paragraph (6) (d) of the Complaint.

(e) The Respondent, without prejudice to and consistent with the averments set forth in Paragraph (5) (a), above, and Paragraphs (6) (a), (b), (c) and (d), above, admits the allegations set forth in Paragraph (6) (e) of the Complaint.

(7) The Respondent denies each and every allegation set forth in Paragraph (7) of the Complaint.

(8) The Respondent denies each and every allegation set forth in Paragraph (8) of the Complaint.

#### FIRST AFFIRMATIVE DEFENSE

(9) The Certification of Representative issued by the National Labor Relations Board in the above-captioned matter on March 4, 2008, is not valid and is unenforceable as a matter of law, in light of the refusal of the National Labor Relations Board to sustain Objections

to the Election filed by the Respondent on August 16, 2007 in Case No. 28 - RC - 6518, and in light of the further failure of the General Counsel to issue a complaint in connection with unfair labor practice charges filed by the Respondent on August 16, 2007, in Case No. 28 - CB - 6651.

SECOND AFFIRMATIVE DEFENSE

(10) The Certification of Representative issued by the National Labor Relations Board in the above-captioned matter on September 30, 2010, is not valid and is unenforceable as a matter of law, in light of the refusal of the National Labor Relations Board to sustain Objections to the Election filed by the Respondent on August 16, 2007 in Case No. 28 - RC - 6518, and in light of the further failure of the General Counsel to issue a complaint in connection with unfair labor practice charges filed by the Respondent on August 16, 2007, in Case No. 28 - CB - 6651.

WHEREFORE, the Respondent respectfully requests that the Complaint be dismissed in its entirety.

Dated: February 28, 2011

Respectfully Submitted,



Don T. Carmody, Esq.

Attorney for Alta Vista Regional Hospital

Post Office Box 3310  
Brentwood, Tennessee 37024-3310  
(615) 519-7525

UNITED STATES OF AMERICA  
BEFORE THE NATIONAL LABOR RELATIONS BOARD  
REGION 28

-----X  
In the Matter of :  
 :  
 :  
SAN MIGUEL HOSPITAL CORP. d/b/a :  
ALTA VISTA REGIONAL HOSPITAL : 28- CA-22280  
and :  
 :  
 :  
DISTRICT 1199NM, NATIONAL UNION OF :  
HOSPITAL AND HEALTHCARE EMPLOYEES :  
-----X

**CERTIFICATE OF SERVICE OF  
ANSWER TO AMENDED COMPLAINT**

The Undersigned, Don T. Carmody, Esq., being an Attorney duly admitted to the practice of law, certifies, pursuant to 28 U.S.C. § 1746, that the Answer to Amended Complaint (the "Answer") is being filed this date by Alta Vista Regional Hospital in the above-captioned matter via E-Filing at [www.nlr.gov](http://www.nlr.gov), being the website maintained for Region 28 of the National Labor Relations Board.

The Undersigned further certifies that a copy of the Motion is being served this date upon the following by E-Mail [[shane@youtzvaldez.com](mailto:shane@youtzvaldez.com)] at [www.youtzvaldez.com](http://www.youtzvaldez.com), being the web site maintained for Shane C. Youtz, Esq., Counsel to District 1199NM, National Union of Hospital and Healthcare

Employees, A.F.S.C.M.E., AFL-CIO, the Charging Party in the above-captioned matter:

Shane C. Youtz, Esq.  
Youtz & Valdez, P.C.  
900 Gold Avenue, S.W.  
Albuquerque, New Mexico 87102  
**Fax Number: (505) 244-9700**

Dated: February 28, 2009

Respectfully Submitted,



Don T. Carmody, Esq.

Attorney for San Miguel Hospital  
Corporation d/b/a Alta Vista Regional  
Hospital

Post Office Box 3310  
Brentwood, Tennessee 37027  
(615) 519-7525

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of ACTING GENERAL COUNSEL'S MOTION TO SUPPLEMENT MOTION FOR SUMMARY JUDGMENT AND RECORD in SAN MIGUEL HOSPITAL CORP. d/b/a ALTA VISTA REGIONAL HOSPITAL in Cases 28-CA-21896 et al., was served via E-Gov, E-filing, e-mail and overnight delivery via United Parcel Service on this 4<sup>th</sup> day of March 2011, on the following:

***Via E-Gov E-Filing:***

Lester A. Heltzer, Executive Secretary  
Office of the Executive Secretary  
National Labor Relations Board  
1099 14<sup>th</sup> Street, N.W.  
Washington, D.C. 20570

***One Copy via e-mail on the following:***

Don T. Carmody, Attorney at Law  
134 Evergreen Lane  
Glastonbury, CT 06033  
E-mail: [bryancarmody@bellsouth.net](mailto:bryancarmody@bellsouth.net)

Shane C. Youtz, Attorney at Law  
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900 Gold Avenue SW  
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***One Copy via overnight delivery:***

San Miguel Hospital Corp. d/b/a  
Alta Vista Regional Hospital  
104 Legion Drive  
Las Vegas, NM 87701

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/s/Sarah J. Kaiser

Sarah J. Kaiser  
Acting Secretary to the Regional Attorney  
National Labor Relations Board, Region 28  
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Telephone: (602) 640-2163