

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

CAREY SALT COMPANY, A SUBSIDIARY OF  
COMPASS MINERALS INTERNATIONAL, INC.

and

UNITED STEEL, PAPER AND FORESTRY,  
RUBBER, MANUFACTURING, ENERGY ALLIED  
INDUSTRIAL AND SERVICE WORKERS  
INTERNATIONAL UNION AND LOCAL UNION  
14425

Case Nos. 15-CA-19704  
15-CA-19738

**RESPONDENT'S ANSWERING BRIEF  
TO THE CROSS EXCEPTIONS OF ACTING GENERAL COUNSEL**

General Counsel claims that Respondent's refusal to return from the airport to resume meeting with the Union on the afternoon of March 31 or to meet for bargaining within the next several days was a violation because the Company's bargainer, Victoria Heider, did not offer a sufficient scheduling justification for not doing so. (Charging Party expressly conceded that the Company never refused to meet any time after April 7, 2010 (Tr. 489). It is not for the Board, however, to inquire into whether Ms. Heider's schedule would, or would not, reasonably have permitted her to return to Louisiana for more bargaining, either from the airport later on March 31 or from the Kansas City area during the first week of April. Nor is it ever an unfair labor practice for a party to refuse to meet on a particular day or for a particular period. This is especially true here where the parties had been engaged in good faith bargaining for the two months preceding the several day period when Ms. Heider determined herself to be unavailable.

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

I hereby certify that on the 7th day of October, 2011, Respondent's Answering Brief to Exceptions of Acting General Counsel was e-mailed, to:

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