

UNITED STATES OF AMERICA  
BEFORE THE NATIONAL LABOR RELATIONS BOARD

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CAREY SALT COMPANY, a subsidiary of \*  
COMPASS MINERALS INTERNATIONAL, INC. \*  
Respondent \*

and \*

UNITED STEEL, PAPER AND FORESTRY, \*  
RUBBER, MANUFACTURING, ENERGY, \*  
ALLIED INDUSTRIAL AND SERVICE WORKERS \*  
INTERNATIONAL UNION, and LOCAL 14425 \*  
Charging Parties \*

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

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COUNSEL FOR THE ACTING GENERAL COUNSEL'S  
REPLY BRIEF TO RESPONDENT'S ANSWERING BRIEF

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## **I. Preliminary Statement**

The Honorable Administrative Law Judge Margaret G. Brakebusch (Judge) issued a comprehensive August 1, 2011 decision (or ALJD.) About August 26, 2011, Respondent Carey Salt Company, a Subsidiary of Compass Minerals International, Inc.'s filed Respondent's Exceptions to Decision by Administrative Law Judge (Respondent's Exceptions.) On September 29, 2011, Counsel for the Acting General Counsel (Counsel for the GC) and the Charging Parties, United Steel, Paper and Forestry, Rubber, Manufacturing, Energy, Allied Industrial and Service Workers International Union and Local Union 14425 (the Union), each filed Cross-Exceptions. About October 7, 2011, Respondent filed Respondent's Answering Brief to the Cross-Exceptions of Acting General Counsel (Respondent's Answering Brief) -- only in response to Counsel for the Acting General Counsel's Cross-Exceptions to Decision by Administrative Law Judge (Counsel for the GC's Cross-Exceptions.) As set forth below, Counsel for the GC moves to strike Respondent's Answering Brief in its entirety, because it fails to comport with the Board's Rules and Regulations (Board's Rules.)

## **II. Motion to Strike Respondent's Answering Brief**

Counsel for the GC moves to immediately strike Respondent's Answering Brief in its entirety as it fails to comply with the clear language of the Board's Rules at Section 102.46(d)(2), which clearly provide that any answering brief shall be limited to the questions raised in the exceptions and in the brief in support thereof. In short,



## CERTIFICATE OF SERVICE

I hereby certify that on October 26, 2011, I caused to be E-filed the foregoing Counsel for the Acting General Counsel's Reply Brief to Respondent's Answering Brief and caused to be served by electronic mail (email) copies to the following counsel of Respondent and the Charging Parties:

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/S/  
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