

UNITED STATES OF AMERICA

BEFORE THE NATIONAL LABOR RELATIONS BOARD

REGION 22

EXXONMOBIL RESEARCH & ENGINEERING  
COMPANY, INC.

AND

Case Nos. 22-CA-218903

22-CA-223073

INDEPENDENT LABORATORY EMPLOYEES  
UNION, INC.

22-CA-232016

**NOTICE OF MOTION TO AMEND THE COMPLAINT**

**PLEASE TAKE NOTICE** that at the hearing of this case on the 19<sup>th</sup> of March, 2019 at 9:30 a.m. at the Veteran’s Administration Building, 20 Washington Place, 5<sup>th</sup> Floor, Newark, New Jersey 07102, before an Administrative Law Judge of the National Labor Relations Board, or as soon thereafter as counsel can be heard, the Counsel for the General Counsel will move to amend the Order Consolidating Cases, First Consolidated Amended Complaint and Notice of Hearing as follows:

1. Delete paragraph 8 in its entirety.
2. Modify the date in paragraph 9 to July 8, 2018.
3. Remove the word “implicitly” from paragraph 13(b), which now reads as follows:  
“During the period described above in paragraph 13(a), Respondent threatened to declare impasse over permissive subjects of bargaining, intruded on the Union’s internal process of ratification, refused to bargain over economic matters until non-

economic matters were resolved, insisted upon side agreements to the collective-bargaining agreement that are repugnant of the Act, promised employees parental paid time off if employees withdrew from the Union, refused to bargain over personal time because of a previously filed unfair labor practice charge, and disparaged the Union in its e-mail communications with unit employees.”

Issued at Newark, New Jersey this 7<sup>th</sup> day of March, 2019.

/s/ Joanna Pagones Ross

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Joanna Pagones Ross, Esq.  
Counsel for the General Counsel  
National Labor Relations Board  
Region 22  
20 Washington Place, 5<sup>th</sup> Floor  
Newark, New Jersey 07102

## CERTIFICATION

This is to certify that copies of the foregoing General Counsel's Reply to Respondent's Motion for Bill of Particulars and to Sever have been duly served this date on the following parties:

### E-FILING

Honorable Arthur J. Amchan  
Deputy Chief Administrative Law Judge  
National Labor Relations Board  
1015 Half Street SE  
Washington, DC 20570

### ELECTRONIC MAIL

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Dated at Newark, New Jersey this 7<sup>th</sup> day of March, 2019.

/s/ Joanna Pagones Ross

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Joanna Pagones Ross, Esq.  
Counsel for Acting General Counsel