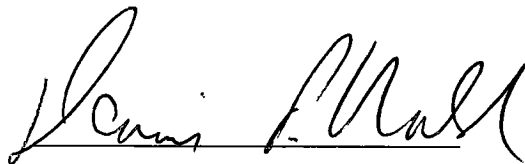


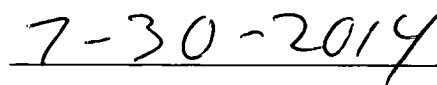
## Ratification of Regional Director Actions

The National Labor Relations Board appointed me Regional Director of Region 4 on March 10, 2013, pursuant to its authority under Section 4 of the National Labor Relations Act. In *NLRB v. Noel Canning, a Division of the Noel Corp.*, No. 12-1281, \_\_ S. Ct. \_\_, 2014 WL 2882090 (June 26, 2014), the Supreme Court held that three Board members who received recess appointments on January 4, 2012 were not validly appointed. On July 18, 2014, in an abundance of caution and with a full complement of five Members, the Board ratified *nunc pro tunc* and expressly authorized my appointment as Regional Director.

I believe that the actions I took between my initial appointment and the ratification were legally authorized and entirely proper. To avoid any possible uncertainty, however, I hereby affirm and ratify any and all actions taken by me or on my behalf during that period, including all personnel and administrative decisions; all actions in representation case matters, including but not limited to approving stipulated and consent election agreements, issuing decisions and directions of election, conducting elections, issuing certifications, holding hearings, and approving settlements; and all actions in unfair labor practice cases, including but not limited to conducting investigations, approving withdrawal requests, issuing complaints, holding hearings, and approving settlements.



Signature



Date