UNITED STATES OF AMERICA
BEFORE THE NATIONAL LABOR RELATIONS BOARD
REGION 19

THE BOEING COMPANY

and **Case 19-CA-32431**

INTERNATIONAL ASSOCIATION OF MACHINISTS AND AEROSPACE WORKERS DISTRICT LODGE 751, affiliated with INTERNATIONAL ASSOCIATION OF MACHINISTS AND AEROSPACE WORKERS

ACTING GENERAL COUNSEL'S OPPOSITION TO MOTION TO INTERVENE BY DENNIS MURRAY, CYNTHIA RAMAKER, AND MEREDITH GOING, SR.

Counsel for the Acting General Counsel opposes the Motion to Intervene ("Motion") filed by Dennis Murray, Cynthia Ramaker, and Meredith Going, Sr. ("Movants") on June 1, 2011. Movants are employed by Respondent The Boeing Company ("Respondent") in North Charleston, South Carolina, and essentially argue that, as such, they are entitled to status as intervenors or, in the alternative, *amici curiae*, in this proceeding. More specifically, Movants argue that they should be allowed to intervene because of the possibility that they will be adversely affected by the outcome of the proceeding.

As set forth below, Movants' interests are already adequately represented by the parties and they, in fact, have no cognizable interest in participating in this proceeding sufficient to justify their intervention. Thus, their unnecessary participation as three additional parties would merely delay and complicate these already complex proceedings. In the interest of a just and speedy resolution of this dispute, intervention

should be denied. The Acting General Counsel believes that, just as Movants do not have an interest that warrants intervention, they also lack a sufficient interest to be accorded *amicus* status. Nevertheless, the Acting General Counsel does not object to their *amicus* status for the sole purpose of filing post-hearing briefs on their own behalf.

I. BACKGROUND

The Complaint in this case alleges, among other things, that Respondent violated Sections 8(a)(1) and (3) of the National Labor Relations Act (the "Act") by deciding to transfer its second 787 Dreamliner production line and an associated sourcing supply program from a bargaining unit represented by Charging Party International Associations of Machinists and Aerospace Workers, District Lodge 751, affiliated with International Associations of Machinists and Aerospace Workers ("Charging Party" or the "Union") to its non-union site in North Charleston, South Carolina. (Complaint ¶¶ 7, 8 & 10)

Part of the remedy pled in the Complaint is an order requiring Respondent to employ bargaining-unit employees to operate its second 787 production line in the State of Washington, and to utilize supply chains operated by union-represented employees at Respondent's Seattle, Washington, and Portland, Oregon, area facilities. (Complaint, ¶ 13(a)) The Complaint specifies that the Acting General Counsel does *not* seek to prohibit Respondent from making non-discriminatory decisions with respect to where work will be performed, including non-discriminatory decisions with respect to work at its North Charleston facility. (Complaint ¶ 13(b))

Respondent has denied that it violated Sections 8(a)(1) and (3) as alleged. (Answer ¶¶ 7, 8, & 10) Respondent also asserts that the requested remedy "is

impermissibly punitive and would cause an undue hardship on [Respondent], its employees, and the State of South Carolina." (Answer, Affirmative Defense 8) In response to the portion of the Complaint specifying that the Acting General Counsel does not seek to prohibit Respondent from making non-discriminatory decisions with respect to where work will be performed, Respondent states that it "denies that the Acting General Counsel has correctly stated that the remedy sought… will not effectively cause [its] assembly facility in North Charleston to shut down." (Answer ¶ 13(b))

II. THE MOTION TO INTERVENE

The Movants seek to intervene to oppose both the substantive allegations and the requested remedy discussed above. (Motion to Intervene at 1) According to the unsworn declarations attached to the Motion (two of which appear to be unsigned), Movants are current employees of Respondent. Two of the Movants, Dennis Murray and Cindy Ramaker, have been employed by Respondent since it purchased a North Charleston fuselage production facility from Vought Aircraft Industries ("Vought") around July 2009. (Murray Declaration at 2; Ramaker Declaration at 1) The employees at that facility voted to decertify the International Association of Machinists and Aerospace Workers (the "IAMAW") as their collective bargaining representative in September 2009, shortly before Respondent's October 2009 announcement of its decision to place the second 787 production line in North Charleston. (Murray Declaration at 4; Ramaker Declaration at 4)

It appears that neither Murray nor Ramaker has been assigned to work on the second 787 production line. (Murray Declaration at 6; Ramaker Declaration at 6) The

third Movant, Meredith Going, Sr., has apparently been hired to work on the second 787 production line, and is currently performing work at Respondent's separate mid-body plant in North Charleston. (Going Declaration at 2-3) The North Charleston facility is still under construction and has not yet commenced operations. (Going Declaration at 3; Murray Declaration at 5; Ramaker Declaration at 6)

In essence, Movants claim to have an interest in these proceedings based on their belief that they will likely be discharged by Respondent if the remedy requested by the Acting General Counsel is granted. Movants also assert that, were such a remedy granted and were Respondent subsequently to offer them employment in the State of Washington or Oregon, their right to choose not to be represented by the IAMAW and to live in the State of South Carolina (as a state that does not permit agreements requiring membership in labor organizations), would be jeopardized. (Motion to Intervene at 3-7) Movants advance these assertions even though the remedy sought by the Acting General Counsel does not require Respondent to shut down any operations in South Carolina, does not require Respondent to transfer any of its South Carolina employees to bargaining unit positions in Washington or Oregon, and does not require any of Respondent's South Carolina employees to be represented by the Union.

Movants state that they wish to introduce evidence concerning the following subjects: (a) their experience with Respondent as employees represented by the IAMAW at the former Vought facility; (b) their reasons for decertifying the IAMAW as their collective-bargaining representative at that facility (including their belief that decertification would make North Charleston a more attractive location for Respondent's second 787 production line); and (c) "their legally protected choice to work at a non-

union factory in South Carolina and to remain working at that factory and have it remain non-union without interference from the NLRB Acting General Counsel." (Motion to Intervene at 12)

III. MOVANTS SHOULD NOT BE PERMITTED TO INTERVENE

A. The Legal Standard

Under Section 10(b) of the Act, Board proceedings need not be limited to necessary parties, and the Board has discretion to decide whether to permit "any other person . . . to intervene." 29 U.S.C. § 160(b). Under Board regulations, a person seeking intervention must "state[] the grounds upon which [he or she] claims an interest" in intervening. 29 C.F.R. § 102.29. It is the Federal Rules of Civil Procedure that apply in determining the appropriateness of intervention in Board proceedings. 29 U.S.C. § 160(b) ("Any such proceeding shall, so far as practicable, be conducted in accordance with . . . the rules of civil procedure for the district courts of the United States . . . ."). Rule 24 of the Federal Rules of Civil Procedure provides for two types of intervention: intervention as of right and permissive intervention.

To meet the requirements for intervention as of right, a movant must hold a legally protected interest and must have some relationship to the claims at issue in the proceeding. *Donnelly v. Glickman*, 159 F.3d at 409. It is well settled that employees do not have any protectable interest in positions they may have obtained due to unlawful employment decisions. *Id.* at 411, *citing Dilks v. Aloha Airlines, Inc.*, 642 F.2d 1155, 1157 (9th Cir. 1981). Indeed, employees *qua* employees are not entitled to intervene as of right.[1] "The courts have uniformly held that . . . [such] employees are not necessary

[1] In countless Board cases involving claims of unlawful discrimination, such as claims of discriminatory discharges, layoffs, refusals to hire, transfers, and demotions, the remedy requires the displacement, if

parties." *Semi-Steel Casting Co. of St. Louis v. NLRB*, 160 F.2d 388, 393 (8th Cir. 1947). *See also NLRB v. Todd Co*., 173 F.2d 705, 707 (2d Cir. 1949); *Oughton v. NLRB*, 118 F.2d 486, 495-96 (1st Cir. 1941) (*en banc*); Fed. R. Civ. P. 24(a)(2). *Cf*. *NLRB v. Pennsylvania Greyhound Lines*, 303 U.S. 261, 271 (1938) ("[Third party's] presence was not necessary in order to enable the Board to determine whether respondents had violated the statute or to make an appropriate order against [respondents]"). Further, movants cannot be authorized to intervene to represent the interests of other employees unless they provide "evidence that [other] employees requested or authorized [the intervenor] to represent [the other employees'] interests." *Washington Gas Light Co*., 302 NLRB 425, n.1 (1991).

Where the movant has no right to intervention, a judge has the discretion to grant permissive intervention where the movant "has a claim or defense that shares with the main action a common question of law or fact." Fed. R. Civ. P. 24(b). In assessing whether to grant permissive intervention, the judge may consider a variety of factors, including:

> the nature and extent of the intervenors' interest, their standing to raise relevant legal issues, …whether the intervenors' interests are adequately represented by other parties, …and whether the parties seeking intervention will significantly contribute the full development of the underlying factual issues in the suit and to the just and equitable adjudication of the legal questions presented.

Spangler v. Pasadena City Bd. of Ed., 552 F.2d 1326, 1329 (9th Cir. 1977) (footnotes omitted). There is a presumption of adequacy of representation when the movant has

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necessary, of individuals holding the positions to which the discriminatees must be instated or reinstated. A rule permitting employees to intervene in unfair labor practice proceedings based on their possibility that they may be displaced as part of the remedy would invite intervention by employees who were not necessarily involved in the events surrounding an alleged unfair labor practice in a vast number of Board cases.

the same ultimate objective as an existing party. *League of United Latin Am. Citizens v. Wilson*, 131 F.3d 1297, 1305 (9th Cir. 1997). Finally, the federal rules specifically require that, "[i]n exercising its discretion, the court must consider whether the intervention will unduly delay or prejudice the adjudication of the original parties' rights." Fed. R. Civ. P. 24(b)(3).

In Board proceedings, where employees seek to intervene for the purpose of establishing the same defense advanced by their employer, and where they have made no showing that they can adduce evidence other than that offered by the employer, they are not entitled to intervene. *Todd Co.*, 173 F.2d at 707; *Semi-Steel Casting Co. of St. Louis*, 160 F.2d at 393 (upholding decision to deny petition by employees opposing a union to intervene in unfair labor practice proceedings concerning their employer's refusal to bargain with the union); *Oughten*, 118 F.2d at 495-96 (upholding decision to deny petition of 75 percent of unit employees to intervene in unfair labor practice proceeding involving allegations that their elected union lost majority support as a result of their employer's unfair labor practices).

B. Movants Are Not Entitled to Intervene as of Right Because They Do Not Have Any Legally Protected Interest in This Proceeding

Here, to the extent that Movants assert they have an interest in this proceeding based on their belief that the remedy sought by the Acting General Counsel will cause their discharges, such speculation simply does not justify their intervention. Movants' asserted belief that they will be discharged lacks foundation, as nothing in the Complaint requires Respondent to shut down any of its operations in South Carolina. As a preliminary matter, two of the three Movants have been not even been assigned to work on the second 787 production line at issue in this case, and they have not

advanced any factual basis for believing that the remedy sought by the Acting General Counsel will affect their positions in the facilities where they work. Further, it is noted that, although Movants claim to represent the interests of all of Respondent's employees in North Charleston, South Carolina, there is no basis for them to be authorized to do so. *See Washington Gas Light Co*., 302 NLRB 425*,* n.1.

Moreover, any employee, including any of the Movants, who starts working on the second 787 production line and the associated sourcing supply program once production commences in North Charleston, South Carolina, will have obtained their positions by virtue of the Employer's alleged unlawful employment decision. Therefore, any interest Movants may have in being placed in those prospective positions is insufficient to warrant their intervention. *See Donnelly*, 59 F.3d at 411; *Dilks*, 642 F.2d at 1157.

Movants assert that the remedy sought by the Acting General Counsel, in addition to causing their discharges, will interfere with their Section 7 right to elect not to be represented by a union as well as their right to live in the State of South Carolina, where they are not represented by a union. (Motion to Intervene at 12) These claims do not establish any cognizable interest in these proceedings, as the remedy sought by the Acting General Counsel plainly does not interfere with these rights.

C. Movants are Not Entitled to Permissive Intervention Because Their Asserted Interests are Adequately Represented by Respondent, any Relevant Evidence They Possess May be Offered by Them as Witnesses, and Their Participation Would Unduly Burden the Board's Processes

Movants state that they seek to intervene to oppose the Complaint and the requested remedy. (Motion to Intervene at 1) This is the exact same ultimate objective

as Respondent. Accordingly, it must be presumed that Movants' interests will be adequately represented. *See League of United Latin Am. Citizens*, 131 F.3d at 1305. While Movants suggest that their interests may diverge from the interests of Respondent, their arguments in this regard fall wide off the mark.

Specifically, Movants have stated that they wish to present evidence concerning the personal effects the pled remedy would have on "their legally protected choice to work at a non-union factory in South Carolina and to remain working at that factory and have it remain non-union without interference from the NLRB Acting General Counsel." (Motion to Intervene at 12) Precisely what evidence Movants intend to present concerning these personal effects is unclear; however, the Acting General Counsel respectfully submits that Movants are only in a position to speculate about what business decisions Respondent will make if the remedy sought by the Acting General Counsel is granted. As sheer speculation, their testimony in this regard would be irrelevant and inherently unreliable.

In any event, crafting an appropriate remedy for unlawful discrimination does not involve a balancing of the personal hardships that discriminatees will suffer as a result of the discrimination against the personal hardships the remedy may potentially cause to individuals who obtained their positions as a result of the unlawful discrimination. Indeed, the Board's practice is to order reinstatement of unlawfully terminated employees, even when their former position has been filled and it is necessary to displace the discriminatee's replacement. *See* Board's Casehandling Manual, Part Three, Compliance Proceedings, § 10530.2: "Reinstatement is not foreclosed because the position has been filled since the unlawful action or because a replacement

employee will have to be displaced in order to effectuate reinstatement." *See also Page Aircraft*, 123 NLRB 159, 179-80 (1959) (Board ordered reinstatement of striking employees and, as necessary, the displacement of other employees).

Finally, Movants assert that they possess relevant evidence and wish testify concerning their experience with Respondent as employees represented by the IAMAW at the former Vought facility as well as their reasons for decertifying the IAMAW as their collective-bargaining representative. (Motion to Intervene at 12) However, their participation as intervenors is not required in order to either meet these goals or develop a complete record. To the extent such evidence is relevant, the parties may call Movants or other individuals who worked at the plant at the time of the decertification to testify about any relevant facts. Thus, they need only appear as witnesses.

Because any relevant evidence Movants claim to possess will be adduced by either Counsel for the Acting General Counsel or Counsel for Respondent (which shares Movants' stated interest in this proceeding), intervention would serve only to unnecessarily delay and complicate these already complex proceedings. Granting Movants or other individuals intervenor status would complicate the course of this litigation as each one would be entitled, for example, to enter into stipulations, take interlocutory appeals, or be involved in (and a necessary party to) settlement discussions. Since Movants' interests are already represented by Respondent, the procedural burdens that would result from their participation as additional parties in this case render permissible intervention particularly inappropriate.

D. The Cases Cited By Movants in Support of Intervention Are Inapposite

Movants have cited a number of Board cases which they claim support the proposition that the Board has allowed employees to intervene in a variety of settings

"to protect their interests and help defend their employer." (Motion to Intervene at 11) However, those cases are considerably more limited — employees were permitted to intervene only to litigate issues bearing directly on their Section 7 rights, including their unions' majority status, unions' improper solicitation of authorization cards, and the propriety of their employer's refusal to withhold union dues. *See Washington Gas Light Co.*, 302 NLRB 425, n.1 (1991); *J.P. Stevens & Co.*, 179 NLRB 254, 255 (1969); *Sagamore Shirt Co.*, 153 NLRB 309, n.1 (1965); *Gary Steel Prods. Corp.*, 144 NLRB 1160, n.1, 1162 (1963). Those issues do not exist in this case.

Moreover, *International Ladies' Garment Workers Union v. NLRB*, 374 F.2d 295 (D.C. Cir. 1967), which Movants characterize as "[p]erhaps the most important and analogous case to consider," does not even involve a motion by employees to intervene in Board proceedings. *Id.* In that case, the Board ordered an employer to bargain with a union as the representative of its employees in Florida after the employer illegally moved its business from New York to Florida to avoid the union. *Id.* Movants claim that the court "bemoaned the fact that…employees did not intervene." (Motion to Intervene at 9) However, the court did not suggest that the Florida employees should have intervened, as Movants imply. Rather, the court found that the absence of the Florida employees in the proceedings did not necessarily mean that the bargaining order was appropriate, but rather begged the question of whether the Florida employees' Section 7 rights were being violated by the Board's imposition of the order. *Id.* at 300.

Further, the *International Ladies' Garment Workers Union* case is distinguishable because the remedy in that case would have affected the Florida employees Section 7 rights. Here, in contrast, the complaint does not seek any remedy impacting Movants'

Section 7 rights. The complaint does not seek a order requiring Respondent to bargain with the Union on their behalf, and it does not seek a requirement that Respondent transfer Movants, or any other employees, to bargaining-unit positions. Thus, Movants have not cited any case in which employees were permitted to intervene because of the possibility that, as part of the remedy, they might be displaced from positions they obtained as a result of an alleged unlawful employment decision.

Movants also cite cases in which benefit fund trustees and unions were permitted to intervene in Board proceedings. However, those cases also do not establish any basis for permitting intervention by employees who obtained their positions as a result of an allegedly unlawful employment decision. In *Camay Drilling Co.*, 239 NLRB 997 (1978), cited by Movants, benefit fund trustees moved to intervene in a case involving an employer's unilateral withholding of benefit contribution increases. *Id.* at 997. The Board found that the trustees should be permitted to intervene in view of rigorous fiduciary obligations requiring them to collect amounts due the funds, the lack of adequate protection of their position by any original party, and their unique possession of relevant evidence bearing on critical issues. *Id.* at 998. In *Valencia Baxt Express, Inc.*, 143 NLRB 211 (1963), a union that would lose its position as the employees' collective bargaining representative if a rival union prevailed in a withdrawal of recognition case was permitted to intervene. In *Harvey Aluminum*, 142 NLRB 1041, 1043 (1963), a union was permitted to intervene in a case involving the discharges of two employees for supporting the union. *Id*. at 1043-44, 1053. In *Frito Co. v. NLRB*, 330 F.2d 458 (9th Cir. 1964), an employer and a union that were parties in one case were permitted to intervene in another case, when their case was consolidated with the

other case by the court. *Id.* at 459. Thus, the cases involving intervention by benefit fund trustees and unions are also inapposite.

IV. ALTHOUGH MOVANTS LACK A SUFFICIENT INTEREST TO BE ACCORDED *AMICUS* STATUS, THE ACTING GENERAL COUNSEL DOES NOT OBJECT TO MOVANTS BEING GRANTED SUCH STATUS FOR THE SOLE PURPOSE OF FILING POST-HEARING BRIEFS

Even to have *amicus curiae* status, a movant must establish an adequate interest in the proceedings and desirability and relevance of their *amicus* brief to the proceedings. *Neonatology Assoc. v. Comm'r of Internal Revenue*, 293 F.3d 128, 131 (3d Cir. 2002). Thus, a judge should never "grant permission to file an amicus curiae brief that essentially merely duplicates the brief of one of the parties." *Nat'l Org. for Women v. Scheidler*, 223 F.3d 615, 617 (7th Cir. 2000). For the same reasons they do not have an interest warranting their intervention, Movants to not have an interest in this proceeding sufficient to warrant *amicus* status. Further, as discussed above, their interests and positions parallel those of Respondent. Although Movants do not meet the standards warranting *amicus* status, the Acting General Counsel does not object to Movants being granted *amicus* status for the limited purpose of filing post-hearing briefs on their own behalf.[2]

V. Conclusion

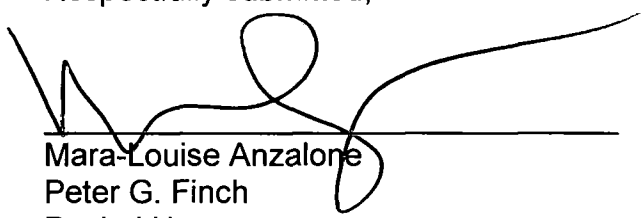
As explained above, Movants' intervention is inappropriate because their interest in maintaining any positions they may have obtained due to Respondent's unlawful employment decisions is not the type of interest that justifies intervention as of right in unfair labor practice proceedings, and their asserted interests in this matter coincide so

[2] As discussed above, although Movants claim to be authorized to speak "on behalf of" all of Respondent's employees in North Charleston, South Carolina, there is no basis for them to be authorized to do so. *See Washington Gas Light Co*., 302 NLRB at 425, n.1.

closely with the interests of Respondent that they will be adequately represented without the need for permissive intervention and the attendant procedural burdens. The Acting General Counsel also posits that Movants lack a sufficient interest to be accorded *amicus* status, but does not object to their being granted status for the sole purpose of filing post-hearing briefs. The Acting General Counsel therefore respectfully urges the Administrative Law Judge to deny Movants' Motion to Intervene.

DATED at Seattle, Washington, this 7th day of June, 2011.

Respectfully submitted,



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CERTIFICATE OF SERVICE

I hereby certify that on this 7th day of June 2011, I caused copies of Acting General Counsel's Opposition to Motion to Intervene by Dennis Murray, Cynthia Ramaker, and Meredith Going, Sr. be served upon the following parties:

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