

UNITED STATES OF AMERICA
NATIONAL LABOR RELATIONS BOARD
CHARGE AGAINST LABOR ORGANIZATION
OR ITS AGENTS

DO NOT WRITE IN THIS SPACE	
Case 20-CB-10488	Date Filed 4/15/97

INSTRUCTIONS: File an original and 4 copies of this charge and an additional copy for each organization, each local, and each individual named in Item 1 with the NLRB Regional Director of the region in which the alleged unfair labor practice occurred or is occurring.

1. LABOR ORGANIZATION OR ITS AGENTS AGAINST WHICH CHARGE IS BROUGHT

a. Name California Nurses Association	b. Union Representative to contact Debbie Silva
c. Telephone No. (408) 243-3391	d. Address (street, city, state and ZIP code) 1285 El Camino Real, Ste. 104, Santa Clara, CA 95050

e. The above-named organization(s) or its agents has (have) engaged in and is (are) engaging in unfair labor practices within the meaning of section 8(b), subsection(s) (list subsections) (13) of the National Labor Relations Act, and these unfair labor practices are unfair practices affecting commerce within the meaning of the Act.

2. Basis of the Charge (set forth a clear and concise statement of the facts constituting the alleged unfair labor practices)

During the preceding six month period, the Union has failed to bargain in good faith over the effects of the creation of an Advice Call Center at the Employer's Redwood City location in order to delay implementation of the Call Center by avoiding either reaching an agreement or an impasse. The Union has violated its duty to bargain by refusing to meaningfully discuss bargaining proposals, by refusing to make meaningful counter proposals and by otherwise seeking to delay the process, all designed to frustrate the bargaining process and in order to avoid its bargaining obligations.

3. Name of Employer The Permanente Medical Group	4. Telephone No. (415) 299-2000
5. Location of plant involved (street, city, state and ZIP code) 1150 Veterans Blvd., Redwood City, CA 94063	6. Employer representative to contact Henry Diaz
7. Type of establishment (factory, mine, wholesaler, etc.) Hospitals and Clinics	8. Identify principal product or service Health Care
9. Number of workers employed 102 Rns at Redwood City by TPMG	
10. Full name of party filing charge Henry Diaz	
11. Address of party filing charge (street, city, state and ZIP code) 1150 Veterans Blvd., Redwood City, CA 94063	12. Telephone No. (415) 299-3115

13. DECLARATION

I declare that I have read the above charge and that the statements therein are true to the best of my knowledge and belief.

By Henry Diaz Human Resources Consultant
(signature of representative or person making charge)
Address 1150 Veterans Blvd., Redwood City, CA 94063 (415) 299-3115 (title or office, if any)
(Telephone No.) 4-7-97 (date)