

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

DO NOT WRITE IN THIS SPACE	
Case 20-CB-11128	Date Filed 5/28/99

INSTRUCTIONS: File an original together with four copies and a copy for each additional charged party named in item 1 with NLRB Regional Director for the region in which the alleged unfair labor practices 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 Eric Hall	
c. Telephone No. 510-273-2200 Fax No. 510-663-1625	d. Address (Street, city, state, and ZIP code) 2000 Franklin Street, Suite 300 Oakland, California 94612		

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) 8(b)(1), 8(b)(3) 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)
Within the last six months, and at all times thereafter, the above-named labor organization, by its officers, agents, and representatives, has restrained and coerced employees of Novato Community Hospital in their exercise of the rights guaranteed in Section 7 of the National Labor Relations Act.

Within the last six months, and at all times thereafter, the above-named labor organization, by its officers, agents, and representatives, has failed and refused to bargain collectively and in good faith with Novato Community Hospital, although said labor organization has been designated and selected by a majority of the employer's employees in an appropriate unit for collective bargaining with respect to rates of pay, wages, hours of employment, and other conditions of employment.

Within the last six months, the above named labor organization, by its officers, agents, and representatives, reached two successive tentative agreements with the employer for a renewal collective bargaining agreement and thereafter failed and refused to support those tentative agreements to its membership.

Since on or about May 24, 1999, the above-named labor organization has threatened to engage in a strike and picketing on June 9, 1999, at the facilities of Novato Community Hospital, a health care institution, notwithstanding that said labor organization failed to provide the requisite written notice of proposed contract termination or modification to the employer, and failed to provide the requisite notice of the existence of a dispute to the State agency established to mediate and conciliate such disputes, as required by Section 8(d) of the National Labor Relations Act.

The Employer requests injunctive relief under Section 10(j) of the National Labor Relations Act.

3. Name of Employer Novato Community Hospital		4. Telephone No. 415-899-9550 Fax No. 415-899-9584	
5. Location of plant involved (street, city, state and ZIP code) 1625 Hill Road, Novato, California 94947		6. Employer representative to contact F. Curt Kirschner David J. Reis	
7. Type of establishment (factory, mine, wholesaler, etc.) Hospital	8. Identify principal product or service Health Care	9. Number of workers employed 300	
10. Full name of party filing charge Same as above		12. Telephone No. Same as above	
11. Address of party filing charge (street, city, state and ZIP code.) Same as above		12. Telephone No. Same as above	

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 David J. Reis (signature of representative or person making charge)
David J. Reis, F. Curt Kirschner, attorneys
(Print/type name and title or office, if an attorney)
O'Melveny & Myers LLP (Firm)
Address: 275 Battery Street, San Francisco, CA 94111 (Telephone No.) 415-984-8700 (Date) May 28, 1999