

# JONES DAY

51 LOUISIANA AVENUE, N.W. • WASHINGTON, D.C. 20001-2113

TELEPHONE: +1.202.879.3939 • FACSIMILE: +1.202.626.1700

DIRECT NUMBER: (202) 879-5425  
PDUNN@JONESDAY.COM

May 31, 2018

## VIA FAX

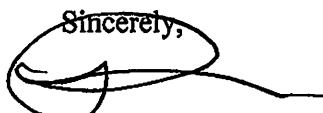
Darren Carroll  
TNG Representative  
501 3rd Street, NW  
6th Floor  
Washington, DC 20001  
Telephone: (202) 434-7177  
Fax: (202) 434-1472  
Email: darren.d.carroll@gmail.com

Re: Los Angeles Times's Unfair Labor Practice Charge Against the Guild

Dear Mr. Carroll:

Attached is a copy of an unfair labor practice charge that we electronically filed today, on behalf of the *Los Angeles Times*, with the National Labor Relations Board.

Sincerely,



Patricia A. Dunn

cc: Jim Kirk  
Colin Crawford

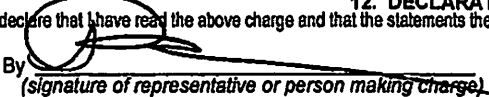
Attachment

INTERNET  
FORM NLRB-508  
(2-08)UNITED STATES OF AMERICA  
NATIONAL LABOR RELATIONS BOARD  
CHARGE AGAINST LABOR ORGANIZATION  
OR ITS AGENTS

FORM EXEMPT UNDER 44 U.S.C 3512

DO NOT WRITE IN THIS SPACE	
Case	Date Filed

INSTRUCTIONS: File an original with NLRB Regional Director for 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 Los Angeles Times Guild and The NewsGuild-CWA		b. Union Representative to contact Darren Carroll, TNG Representative	
c. Address (Street, city, state, and ZIP code) 501 3rd Street, NW 6th Floor Washington, DC 20001		d. Tel. No. (202) 434-7177	e. Cell No.
		f. Fax No. (202) 434-1472	g. e-Mail darren.d.carroll@gmail.com
h. 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) 3 of the National Labor Relations Act, and these unfair labor practices are unfair practices affecting commerce within the meaning of the Act, or these unfair labor practices are unfair practices affecting commerce within the meaning of the Act and the Postal Reorganization Act.			
2. Basis of the Charge (set forth a clear and concise statement of the facts constituting the alleged unfair labor practices) Since on or about April 24, 2018, and continuing to date, the Los Angeles Times Guild and The NewsGuild-CWA have failed and refused to bargain in good faith with the Employer by engaging in conduct that includes failing and refusing to provide the Employer with information that is relevant and necessary for bargaining and failing to respond to the Employer's information request in a timely manner.			
3. Name of Employer Los Angeles Times Communications, LLC		4a. Tel. No. (213) 237-7677	b. Cell No.
		c. Fax No.	d. e-Mail colin.crawford@latimes.com
5. Location of plant involved (street, city, state and ZIP code) 202 West First Street Los Angeles, CA 90012		6. Employer representative to contact Colin Crawford	
7. Type of establishment (factory, mine, wholesaler, etc.) News and Media Publisher	8. Identify principal product or service Newspaper and related products	9. Number of workers employed 330	
10. Full name of party filing charge Los Angeles Times Communications, LLC		11a. Tel. No. (213) 237-7077	b. Cell No.
		c. Fax No.	d. e-Mail colin.crawford@latimes.com
11. Address of party filing charge (street, city, state and ZIP code.) 202 West First Street Los Angeles, CA 90012			
12. 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  Patricia A. Dunn (signature of representative or person making charge) (Print/type name and title or office, if any)		Tel. No. (202) 879-5425	
		Cell No.	
		Fax No. (202) 626-1700	
Address 51 Louisiana Ave., NW Washington, D.C. 20001 (date) 5/31/2018		e-Mail pdunn@jonesday.com	

WILLFUL FALSE STATEMENTS ON THIS CHARGE CAN BE PUNISHED BY FINE AND IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001)

## PRIVACY ACT STATEMENT

Solicitation of the information on this form is authorized by the National Labor Relations Act (NLRA), 29 U.S.C. § 151 et seq. The principal use of the information is to assist the National Labor Relations Board (NLRB) in processing unfair labor practice and related proceedings or litigation. The routine uses for the information are fully set forth in the Federal Register, 71 Fed. Reg. 74942-43 (Dec. 13, 2006). The NLRB will further explain these uses upon request. Disclosure of this information to the NLRB is voluntary; however, failure to supply the information will cause the NLRB to decline to invoke its processes.