



October 27, 2014

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HEADQUARTERS OFFICE

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Hanah E. Stuart, Appeals Assistant
Public Employment Relations Board
1031 18th Street
Sacramento, CA 95811-4124

Via Electronic and U.S. Mail

Re: *San Bernardino County Public Attorneys Ass'n v. County of San Bernardino*
Case Nos. LA-CE-431-M

San Bernardino County Public Attorneys Ass'n v. County of San Bernardino
Case Nos. LA-CE-554-M

Dear Ms. Stuart:

The County of San Bernardino hereby objects to the "Statement of Supplemental Authority" filed by the San Bernardino County Public Attorneys Association on October 20, 2014. Pursuant to your letter to the parties dated September 9, 2014, "Supplemental authority refers to a **legal authority** not cited to in the parties' prior submissions to the Board itself. (Emphasis added)" The County understood the request for legal authority as a request for cases, statutes, or regulations not cited previously, and not as a request for a supplemental brief. To the extent the Board was inviting the submission of supplement briefs, that was not clear in the letter to the parties.

The County will attempt to address the legal authorities raised by charging party in its presentation at oral argument. However, the County continues to object to charging party's submission of supplemental briefing which went beyond the submission of legal authority. To the extent that the Board decides to consider charging party's supplemental briefing, the County requests that it be allowed to also provide a supplemental brief.

Sincerely,

Timothy G. Yeung

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