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15 PHYSICIANS AND DENTISTS

16 LOS ANGELES COUNTY
17 EMPLOYEE RELATIONS COMMISSION

18 COUNTY OF LOS ANGELES,

19 Charging Party,

20 v.

21 UNION OF AMERICAN PHYSICIANS AND
22 DENTISTS,

23 Respondent.

24 UNION OF AMERICAN PHYSICIANS AND
25 DENTISTS,

26 Charging Party,

27 v.

28 COUNTY OF LOS ANGELES,

Respondent.

**UNION OF AMERICAN PHYSICIANS
& DENTISTS' MOTION TO
CONSOLIDATE**

Case No. 018-23

Case No. TBD/UPC Filed Concurrently

1 The Union of American Physicians & Dentists (“UAPD”) respectfully moves the Los
2 Angeles County Employee Relations Commission (“ERCOM”) to consolidate the above-
3 referenced charges for hearing and determination. UAPD submits this motion as the Respondent
4 in Unfair Practice Case No. 018-23 and as the Charging Party in Unfair Practice Case No. TBD,
5 filed concurrently herewith this motion.

6 In Unfair Practice Case No. 018-23, as an affirmative defense to the County’s pre-impasse
7 strike cause of action, UAPD will assert its strike is not an unlawful pre-impasse strike because it
8 is an unfair labor practice strike. UAPD will be able to rebut any presumption that the strike is an
9 unlawful pre-impasse strike. UAPD will offer extensive proof of the County of Los Angeles’
10 unfair practices and that those unfair practices provoked the UAPD unfair practice strike.

11 It would be repetitive and inefficient for the parties to litigate in two separate proceedings
12 the issue of whether the UAPD strike was motivated in whole or in part by the County of Los
13 Angeles’s unfair practices. Likewise, it would be repetitive and inefficient for the parties to
14 litigate in two separate proceedings the issue of whether the County of Los Angeles committed
15 unfair practices that motivated the strike. Consolidated proceedings will help avoid unnecessary
16 costs, delays and serve the interest of judicial economy and convenience.

17 For the foregoing reasons, UAPD requests that ERCOM consolidate the aforementioned
18 unfair practice charges.

19 Dated: December 18, 2023

WEINBERG, ROGER & ROSENFELD
A Professional Corporation

21 
22 _____
KERIANNE R. STEELE

By:

Attorneys for Charging Party UNION OF
AMERICAN PHYSICIANS AND DENTISTS

24 157550/1427086

1 **PROOF OF SERVICE**

2 I am a citizen of the United States and resident of the State of California. I am employed
3 in the County of Alameda, State of California, in the office of a member of the bar of this Court,
4 at whose direction the service was made. I am over the age of eighteen years and not a party to
5 the within action.

6 On December 18, 2023, I served the following documents in the manner described below:

7 **UNION OF AMERICAN PHYSICIANS AND DENTISTS’ MOTION TO CONSOLIDATE**

- 8 (BY U.S. MAIL) I am personally and readily familiar with the business practice of
9 Weinberg, Roger & Rosenfeld for collection and processing of correspondence for
10 mailing with the United States Postal Service, and I caused such envelope(s) with
postage thereon fully prepaid to be placed in the United States Postal Service at
Emeryville, California.
- 11 (BY MESSENGER SERVICE) by consigning the document(s) to an authorized
12 courier and/or process server for hand delivery on this date.
- 13 (BY OVERNIGHT MAIL) I am personally and readily familiar with the business
14 practice of Weinberg, Roger & Rosenfeld for collection and processing of
correspondence for overnight delivery, and I caused such document(s) described herein
15 to be deposited for delivery to a facility regularly maintained by United Parcel Service
for overnight delivery.
- 16 (BY ELECTRONIC SERVICE) By electronically mailing a true and correct copy
17 through Weinberg, Roger & Rosenfeld’s electronic mail system from
smizuhara@unioncounsel.net to the email addresses set forth below.
- 18 (BY PERSONAL DELIVERY) I caused such envelope to be delivered by hand to the
offices of each addressee below.

19 On the following part(ies) in this action:

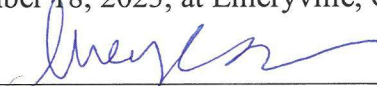
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I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on December 18, 2023, at Emeryville, California.



Muey M. Saeteun