

COMMONWEALTH OF MASSACHUSETTS
APPEALS COURT

Board of Higher Education)	
Respondent/Appellant)	
)	
v.)	
)	
Commonwealth Employment Relations)	
Board,)	2015-J-0076
Appellee Agency)	
)	
&)	
)	
Massachusetts State College Association,)	
MTA/NEA)	
Charging Party/Intervener)	
)	

MOTION TO INTERVENE

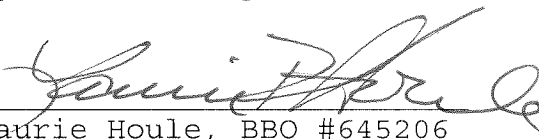
The Massachusetts State College Association ("MSCA") respectfully moves to intervene in the above-captioned matter. As the charging party in the original unfair labor practice charge filed at the administrative agency, the MSCA is entitled by right to intervene in the proceeding on appeal. See G.L. c. 30A, § 14(2) ("All parties to the proceeding before the agency shall have the right to intervene in the proceeding for review.")¹ The Motion to Stay Enforcement of the Decision of the Commonwealth Employment Relations Board ("CERB") filed by the

¹ Pursuant to G.L. c. 150E, § 11(i), appeals of final decisions of the CERB shall be governed by G.L. c. 30A, § 14.

Appellant Board of Higher Education ("Board") is a part of the "proceeding for review" and thus the MSCA should have the right to intervene and oppose this Motion as well.

The Board and the CERB have no objection to the MSCA intervening in this matter.

Respectfully submitted,
MASSACHUSETTS STATE COLLEGE
ASSOCIATION,
by its attorney,



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DATE: March 20, 2015

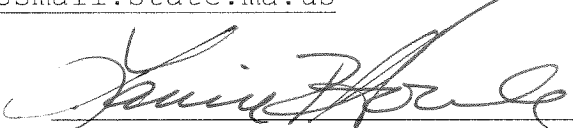
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CERTIFICATE OF SERVICE

Pursuant to Appellate Rule 13, I hereby certify under the pains and penalties of perjury that on March 20, 2015, a true copy of the above document was served via first class mail, postage-prepaid, upon the following counsel of record:

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