

when Congress enacted the NLRA, it intentionally left certain areas of conduct unregulated, instead “to be controlled by the free play of economic forces.”¹⁴ *Machinists* preemption, then, is the doctrine preempting state regulation of labor relations “intentionally left unregulated” by Congress.¹⁵

14. *Id.* at 140 (quoting *NLRB v. Nash-Finch Co.*, 404 U.S. 138, 144 (1971)).

15. BLACK'S LAW DICTIONARY 1196 (7th ed. 1999) (defining *Machinists* preemption as “[t]he doctrine prohibiting state regulation of an area of labor activity or management-union relations that Congress has intentionally left unregulated”).