

**UNITED STATES OF AMERICA
BEFORE THE NATIONAL LABOR RELATIONS BOARD
WASHINGTON, D.C.**

**SPECIALTY HEALTHCARE AND
REHABILITATION CENTER OF MOBILE,**)

Employer,)

and)

**UNITED STEEL, PAPER AND FORESTRY,
RUBBER, MANUFACTURING, ENERGY,
ALLIED INDUSTRIAL AND SERVICE
WORKERS INTERNATIONAL UNION,**)

Petitioner)

Case No. 15-RC-8773

**EMPLOYER'S REQUEST FOR AN EXTENSION OF TIME
TO FILE ITS REQUEST FOR REVIEW OF THE REGIONAL DIRECTOR'S
DECISION AND DIRECTION OF ELECTION**

COMES NOW, Specialty Healthcare and Rehabilitation Center of Mobile ("Employer") in the above-captioned matter, and pursuant to Section 102.67(k) of the Board's Rules and Regulations, files this Request For An Extension Of Time To File Its Request For Review Of The Regional Director's Decision And Direction Of Election, as well its Brief in Support of the Request for Review.

The Regional Director's Decision and Direction of Election in the above-captioned case was issued on January 20, 2009. All Requests for Review and supporting briefs are currently due to be received by the Board on or before February 3, 2009. The election is scheduled to be held on February 20, 2009.

The Employer hereby requests a six (6) day extension for filing its Request and Brief, thereby extending the due date to February 9, 2009. The Employer has also informed the Petitioner's representative of its Request.

This Request is based on the following:

1. The complex and numerous issues of fact involved in the instant matter;
2. The complex and numerous issues of law involved in the instant matter; and
3. The current case load of counsel involved with this matter.

Based on the foregoing, the Employer respectfully requests that an extension of six (6) days be granted, so that its Request for Review may be filed on February 9, 2009.

Respectfully submitted this 26th day of January, 2009.



Clifford H. Nelson, Jr.
Leigh E. Tyson
Counsel for Employer

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CERTIFICATE OF SERVICE

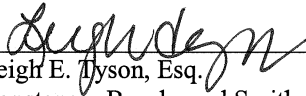
I certify I have filed one electronic copy of the Employer's Request for Extension via the NLRB website. In addition, I certify that I have filed 8 copies of the Employer's Request with the National Labor Relations Board in Washington, D.C.

In addition, a copy of the foregoing has been sent via UPS Overnight Delivery to each of the parties listed below:

M. Kathleen McKinney
Regional Director
NLRB, Region 15
1515 Poydras Street, Suite 610
New Orleans, LA 70112-3723

Randy Rigsby
Staff Organizer
USW, District 9
1900 Crestwood Blvd., Suite 302
Irondale, AL 35210

This 26th day of January, 2009.



Leigh E. Tyson, Esq.
Constangy, Brooks and Smith, LLC