

**UNITED STATES OF AMERICA
BEFORE THE NATIONAL LABOR RELATIONS BOARD**

FLAGSTAFF MEDICAL CENTER, INC.

and

**Cases 28-CA-21509
28-CA-21637
28-CA-21664**

**COMMUNICATION WORKERS OF AMERICA,
LOCAL UNION 7019, AFL-CIO**

and

Case 28-CA-21548

**NATIONAL NURSES ORGANIZING COMMITTEE/
CALIFORNIA NURSES ASSOCIATION (NNOC/CNA)**

**FLAGSTAFF MEDICAL CENTER, INC. and
SODEXO, AMERICA, LLC, as Joint Employers**

and

**Case 28-CA-21704
28-CA-21728**

**COMMUNICATION WORKERS OF AMERICA,
LOCAL UNION 7019, AFL-CIO**

**FLAGSTAFF MEDICAL CENTER, INC.'S AND SODEXO AMERICA, LLC'S
SUPPLEMENTAL MOTION TO EXCEED PAGE LIMIT**

Under Section 102.46 (j) of the Board's Rules and Regulations, Respondents Flagstaff Medical Center, Inc. and Sodexo America, LLC move for permission to exceed the page limit for its Answering Brief to the General Counsel's Exceptions, currently due on July 29, 2009, from 85 to 120 pages.

The General Counsel's Statement Of Exceptions contains 70 separate and distinct exceptions to the Administrative Law Judge's findings and conclusions. The General Counsel's Brief In Support Of Exceptions raises numerous complex legal and factual issues related to those exceptions. Notably, this matter involved a lengthy 16-day hearing over the course of 4 months,

in which 32 witnesses testified, the parties offered 124 exhibits, the transcript was nearly 2,300 pages, and Respondents' Post-Hearing Brief was 284 pages and the Counsel for the General Counsel's Post-Hearing Brief was 123 pages.


Respondents initially anticipated that they would be able to combine their responses to some of the CGC's exceptions, which was their basis for the initial request to exceed the page limit to 85 pages. As we have analyzed each of the CGC's 70 exceptions and related arguments in her supporting brief, many require separate and distinct factual and legal responses. As such, Respondents request permission to exceed the page limit for a total of 120 pages so that they may adequately and fully respond to the numerous legal and factual issues raised by the General Counsel's Statement Of Exceptions and Brief In Support Of Exceptions.

Counsel for Respondents consulted with Counsel for the Communications Workers of America, Stanley Gosch and Counsel for the National Nurses Organizing Committee/California Nurses Association, Donald Nielsen, and they do not oppose Respondents' request. Counsel for Respondents also attempted to contact Counsel for the General Counsel, Mara-Louise Anzalone, about this request. As of the time of the filing of this Motion, Ms. Anzalone has not responded.

Accordingly, Counsel for Respondents respectfully requests that the Board grant permission for Respondents to file up to a 120 page Answering Brief.

RESPECTFULLY SUBMITTED this 20th day of July, 2009.

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By 

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CERTIFICATE OF SERVICE

The undersigned certifies that I filed an electronic copy of the foregoing via the Board's electronic filing service on July 20, 2009, to:

Lester Heltzer
Executive Secretary
National Labor Relations Board
1099 14th Street N.W.
Washington D.C. 20570

The undersigned certifies that I served a copy of the foregoing via e-mail on July 20, 2009, to:

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