UNITED STATES OF AMERICA
BEFORE THE NATIONAL LABOR RELATIONS BOARD

AIR LINE PILOTS ASSOCIATION, INTERNATIONAL	5-CA-34837
	5-CA-35014
and	5-CA-35244
	5-CA-35419
UNION OF ALPA PROFESSIONAL AND ADMINISTRATIVE EMPLOYEES, UNIT 1	

CORRECTED JOINT REQUEST OF RESPONDENT AND CHARGING PARTY TO EXCEED THE PAGE LIMIT ON BRIEFS IN SUPPORT OF EXCEPTIONS AND ANSWERING BRIEFS

Pursuant to Sections 102.46(j) and 102.47 of the Board's Rules and Regulations, the Respondent, Air Line Pilots Association, International ("ALPA") and the Charging Party, Union of ALPA Professional and Administrative Employees, Unit 1 ("Unit 1") jointly request additional pages for briefs in support of exceptions and cross-exceptions to the Administrative Law Judge's Decision ("ALJD") and any answering briefs in this matter. Under Section 102.46(j), briefs in support of exceptions, cross-exceptions, and answering briefs may be no longer than 50 pages unless permission to exceed is obtained from the Board. The NLRB General Counsel does not oppose this motion.

ALPA and Unit 1 request an additional 30 pages per brief. There are two reasons for this request. First, the issues underlying the ALJD are complex and numerous. The ALJD addressed four separate charges, each of which involve distinct areas of law. Second, the record in this case is extensive. The ALJ conducted five days of hearing, heard testimony from numerous witnesses, and received hundreds of pages of exhibits, many of which reflect the twenty years of bargaining history between ALPA and Unit 1.

The complexity and numerosity of the issues is reflected in length of the parties' briefs

below: 83 pages (General Counsel), 75 pages (Unit 1), and 86 pages (ALPA). In order to similarly thoroughly and appropriately address the voluminous record and multiple issues at the exceptions stage, the parties will require more than the 50 pages normally permitted by the Board's Rules and Regulations.

Accordingly, the parties respectfully request permission to exceed the page limit by thirty (30) additional pages in their briefs in support of exceptions and cross-exceptions to the ALJD, and any answering briefs.

Sincerely,

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Dated: May 6, 2011

CERTIFICATE OF SERVICE

I hereby certify that, on May 6, 2011, I served a copy of this document, Joint Request to Exceed the Page Limit on Briefs in Support of Exceptions and Answering Briefs, by email service upon the following.

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