

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

**LA FILM SCHOOL, LLC and its branch  
LA RECORDING SCHOOL, LLC**

**Respondent,**

**And**

**Case Nos.    31-CA-29627  
                  31-CA-29642  
                  31-CA-29719  
                  31-CA-29773  
                  31-CA-29775  
                  31-CA-29776**

**CALIFORNIA FEDERATION OF TEACHERS,  
BRANDII GRACE, an Individual and CELINA REISING,  
an Individual**

**Charging Parties.**

**RESPONDENT'S OPPOSITION TO THE ACTING GENERAL  
COUNSEL'S MOTION TO AMEND HIS ANSWERING BRIEF TO  
RESPONDENT'S EXCEPTIONS TO THE DECISION OF THE  
ADMINISTRATIVE LAW JUDGE**

**FOLEY & LARDNER LLP  
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Scott P. Inciardi  
555 California Street, 17<sup>th</sup> Floor  
San Francisco, California 94104  
Telephone: (415) 434-4484  
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Respondent Los Angeles Film Schools, LLC (“Respondent”) hereby files its opposition to the Acting General Counsel’s Motion To Amend His Answering Brief To Respondent’s Exceptions To The Decision Of The Administrative Law Judge.

On Monday, June 13, 2011, counsel for Respondent brought to Counsel for the General Counsel’s attention that their answering brief exceeded the 50 page limit applicable to such briefs. 29 C.F.R. § 102.46(j). Counsel for the General Counsel offered no reason for such an oversight (Respondent notes that Counsel for the General Counsel’s Motion filed today also contains no explanation as to why the answering brief did not conform to the page limitation). Counsel for the General Counsel asked Respondent’s counsel to stipulate that Counsel for the General Counsel could file a new brief which complied with the page limitations. After conferring with his client, Respondent’s counsel notified Counsel for the General Counsel on Tuesday June 14, 2011 that he could not so stipulate.

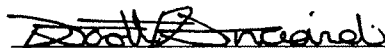
Respondent’s counsel heard nothing further from Counsel for the General Counsel until receiving at approximately noon on Friday, June 17, 2011, Counsel for the General Counsel’s motion to file a new answering brief as well as the new answering brief proposed for filing. While Counsel for the General Counsel represents that the proposed new brief is virtually identical except for the deletion of the Facts section, Respondent needs to now spend time and effort confirming that this is so. In the event that the General Counsel’s motion is granted, Respondent will also need to revise its brief to take account of any changes that were made to the General Counsel’s brief. More importantly, Respondent is required to file a reply to the General Counsel’s original brief no later than Monday, June 20, 2011. Because the General Counsel’s motion has been filed so late, Respondent cannot know at this time whether it should respond to the original brief, the “amended” brief, or either of them.

For these reasons, Respondent requests that either: 1) the Board deny Counsel for the General Counsel's Motion, or 2) grant Respondent an extension to June 27 in order to file its reply brief.

Given the time constraints that have been imposed due to Counsel for the General Counsel's actions, a very prompt response is respectfully requested.

Respectfully submitted this seventeenth day of June, 2011.

**FOLEY & LARDNER LLP**  
RICHARD M. ALBERT  
SCOTT P. INCIARDI

  
\_\_\_\_\_  
Scott P. Inciardi  
Counsel for Los Angeles Film Schools LLP

**Re: LA FILM SCHOOL, LLC AND ITS BRANCH LA RECORDING SCHOOL, LLC**  
**Case Nos. 31-CA-29627, 31-CA-29642, 31-CA-29719, 31-CA-29773, 31-CA-29775, 31-CA-29776**

**CERTIFICATE OF SERVICE**

I hereby certify that I served the document described as **RESPONDENT'S OPPOSITION TO THE ACTING GENERAL COUNSEL'S MOTION TO AMEND HIS ANSWERING BRIEF TO RESPONDENT'S EXCEPTIONS TO THE DECISION OF THE ADMINISTRATIVE LAW JUDGE** in the above-referenced cases on the parties referenced below on the 17<sup>th</sup> day of June, 2011.

**VIA E-FILING**

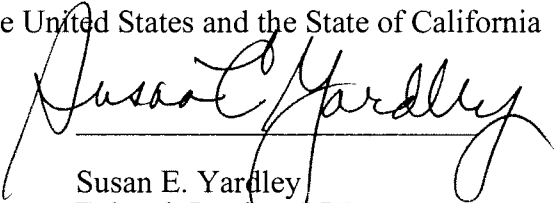
Executive Secretary  
National Labor Relations Board  
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**VIA E-MAIL**

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I declare under penalty of perjury under the laws of the United States and the State of California that the foregoing is true and correct.

  
Susan E. Yardley  
Foley & Lardner LLP