

**NATIONAL LABOR RELATIONS BOARD**

<b>ST. XAVIER UNIVERSITY ADJUNCT FACULTY ORGANIZATION, IEA-NEA</b>	)	
	)	
<b>Petitioner,</b>	)	
	)	<b>Case No. 13-RC-22025</b>
<b>AND</b>	)	
	)	
<b>SAINT XAVIER UNIVERSITY,</b>	)	
	)	
<b>Employer</b>	)	

**PETITIONER’S MOTION FOR ADDITIONAL EXTENSION OF TIME  
IN WHICH TO FILE BRIEF IN SUPPORT OF  
REGIONAL DIRECTOR’S DECISION**

NOW COMES Petitioner, St. Xavier University Adjunct Association, IEA-NEA, and respectfully requests an additional extension of time in which to file a Brief in Support of the Regional Director’s Decision in this matter. In support of the same, Petitioner states as follows:

1. On July 26, 2011, the undersigned Counsel sought additional time due to her heavy litigation schedule. At that time Counsel believed the extension would enable her to attend to all her outstanding litigation obligations and timely file the Brief in this matter by August 19, 2011.
2. One week after receiving this extension of time, on August 3, 2011, the undersigned Counsel broke her arm.
3. On August 10, 2011, the undersigned Counsel learned she had also fractured her elbow which required surgery on August 12, 2011, and hospitalization through August 13, 2011.

4. The undersigned Counsel is the only attorney on record and there is no other attorney familiar with the extensive factual record or legal issues raised in this matter.

5. The undersigned Counsel is unable to complete this brief in the time for doing so previously granted by the Board; due to the extreme hardship of working without her right arm, in addition to convalescing, the undersigned Counsel respectfully requests additional time including and through September 23, 2011, in which to file its Response Brief.

6. The request of this extension is not for purposes of delay but necessary for undersigned Counsel to provide an appropriate and meaningful brief on the issues raised in this matter.

Respectfully submitted,

St. Xavier University Adjunct Assn, IEA-NEA

By: \_\_\_\_\_  
One of its counsel

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