

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

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<b>Mayra L. Sagastume</b>	:	
<b>Charging Party,</b>	:	
	:	Case No. 5-CA-36362
	:	
<b>- and -</b>	:	
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	:	
<b>Coastal Sunbelt Produce, Inc.</b>	:	
<b>Respondent.</b>	:	
	x	

**RESPONDENT’S MEMORANDUM IN OPPOSITION TO COUNSEL FOR THE  
ACTING GENERAL COUNSEL’S MOTION FOR AN EXTENSION OF TIME TO FILE  
AN ANSWERING BRIEF TO RESPONDENT’S EXCEPTIONS**

Pursuant to Section 102.46 of the National Labor Relations Board’s Rules and Regulations, Coastal Sunbelt Produce, Inc. (“Respondent”) hereby opposes Counsel for the Acting General Counsel’s motion for a twenty-five (25) day extension of time until May 25, 2012, to file an Answering Brief to Respondent’s Exceptions to the Administrative Law Judge’s Decision and Order in the above referenced matter. In support of its Memorandum in Opposition, Respondent states, and clarifies Counsel for the Acting General’s factual mischaracterizations, as follows:

1. On April 17, 2012, Respondent agreed to Counsel for the Acting General Counsel’s request for an extension of time until May 25, 2012, to file an Answering Brief to Respondent’s Exceptions.

2. Because Counsel for the Acting General Counsel's Answering Brief would be due immediately before Memorial Day weekend and scheduled vacations in June, Respondent thereafter respectfully requested an extension of time until June 22, 2012, to file a Reply Brief to Counsel for the Acting General Counsel's Answering Brief.
3. Counsel for the Acting General Counsel unreasonably refused to give Respondent the reciprocal courtesy of an extension of time, despite Counsel for the Acting General Counsel expecting Respondent to accommodate her work and personal vacation schedule with a generous extension of time.
4. Respondent was not required to confer with Counsel for the Acting General Counsel prior to requesting a thirty-day (30) extension of time to file its Exception to the Administrative Law Judge's Decision and Order and Memorandum of Law in Support on February 28, 2012.
5. Accordingly, Respondent respectfully opposes Counsel for the General Counsel's unilateral request for an extension of time until May 25, 2012 to file an Answering Brief to Respondent's Exceptions in Case 05-CA-036362, unless Respondent is similarly granted an extension of time up to and including June 22, 2012, to file its Reply Brief to the Counsel for the General Counsel's Answering Brief.

Respectfully submitted,

EPSTEIN BECKER & GREEN, P.C.

By: Kara M. Maciel/cmc  
Kara M. Maciel  
Evan M. Rosen  
Attorneys for Coastal Sunbelt Produce, Inc.  
1227 25th Street NW  
Washington D.C. 20005

**CERTIFICATE OF SERVICE**

I, Kara M. Maciel, hereby certify that a copy of Respondent's Memorandum in Opposition to Acting General Counsel's Motion for an Extension of Time to File an Answering Brief to Respondent's Exceptions was furnished to the following on this 18th day of April 2012:

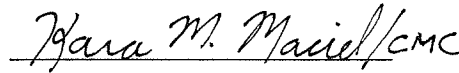
**By Electronic Mail:**

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**By Federal Express:**

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Attorney for Coastal Sunbelt Produce, Inc.