

UNITED STATES OF AMERICA

BEFORE THE NATIONAL LABOR RELATIONS BOARD

<b>Part-Time Faculty Association at</b>	)	
<b>Columbia College, IEA-NEA</b>	)	
	)	
<b>Charging Party</b>	)	<b>Case No. 30-CA-18888</b>
	)	
<b>and</b>	)	
	)	
<b>Columbia College Chicago,</b>	)	
	)	
<b>Respondent</b>	)	

**OBJECTION TO RESPONDENT’S MOTION  
FOR THREE ADDITIONAL WEEKS TO FILE EXEPTIONS**

NOW COMES the Charging Party Part-Time Faculty Association, IEA-NEA (“P-FAC”), by its attorney, Laurie M. Burgess, BURGESS LAW OFFICES, and respectfully objects to Respondent’s Request for an Extension of Time to File Exceptions to the ALJ’s Decision, and in support thereof, P-FAC states as follows:

1. Respondent is seeking an additional *three weeks* of time to file its Exceptions in the captioned matter, and the primary basis for doing so is to accommodate the various vacation plans of its two counsel. Since at least two counsel of record are actively working on this case, Petitioner respectfully submits that “vacation scheduling” does not serve as a proper basis for delaying final resolution of this matter.

2. Contrary to Respondent’s representation (§ 4) Charging Party *will* be prejudiced by an extension of three weeks time in filing Exceptions because Charging Party is in desperate need of final adjudication of the matters raised in this case. Indeed, some of the same issues resolved in the instant case have since been processed through

Complaint and are scheduled for yet another Hearing on October 22, 2012. (*See* Consolidated Complaint in 13-CA-073486, 13-CA-073487, 13-CA-076794, 13-CA-078080, 13-CA-081162, submitted herewith). Moreover, Respondent continues to engage in action similar to the conduct that was addressed in 30-CA-18888, thereby spawning new ULPs and continuing litigation. Petitioner avers that final adjudication by this Board of the instant matter will inform the parties with respect to their current and future conduct.

3. The undersigned counsel, who is the sole counsel of record in this matter for Charging Party, will be actively engaged in trial preparation in the above listed Consolidated Complaint during the time frame that Charging Party's Response to Respondent's Exceptions and Brief in Support would be due (*i.e.* September 28, 2012) if Respondent's request for a three week extension were granted.

WHEREFORE P-FAC respectfully requests that Respondent's Request for a three week Extension of Time to file Exceptions be DENIED.

Respectfully submitted,

Dated August 7, 2012

**Part-Time Faculty Association, IEA-NEA**

s/s Laurie M. Burgess  
Attorney for P-FAC, IEA-NEA

**CERTIFICATE OF SERVICE**

I, Laurie M. Burgess, counsel for the Petitioner, certify that on August 7, 2012, I e- filed and caused a true and correct copy of the foregoing Objection to Respondent's Motion for Three Additional Weeks to File Exceptions to be served upon the following counsel of record via electronic mail:

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Respectfully submitted,

/s/ Laurie M. Burgess