

**UNITED STATES OF AMERICA  
BEFORE THE NATIONAL LABOR RELATIONS BOARD  
REGION 14**

CONVERGYS CORPORATION,	:
	:
	:
And	: Cases 14-CA-075249
	: and 14-CA-083936
	:
HOPE GRANT, An Individual.	:

**MOTION FOR EXTENSION OF TIME TO FILE ANSWERING BRIEF TO  
COUNSEL FOR THE ACTING GENERAL COUNSEL'S CROSS-  
EXCEPTIONS TO THE DECISION OF THE ADMINISTRATIVE LAW JUDGE**

Respondent, Convergys Corporation, hereby requests an extension of time for the filing of an answering brief to Counsel for the Acting General Counsel's cross-exceptions to the decision of the Administrative Law Judge in the above-captioned matter. Respondent requests an extension of time to February 15, 2013, in which to file its answering brief for the reasons set forth below:

1. On January 18, 2013, Counsel for the Acting General Counsel filed cross-exceptions and a brief in support to the Administrative Law Judge's decision.
2. Respondent's answering brief to Counsel for the Acting General Counsel's cross-exceptions is currently due to the Board on February 1, 2013.
3. Respondent seeks an extension of time to file an answering brief in this case to February 15, 2013. The cross-exceptions of Counsel for the Acting General Counsel raise legal issues the complexity of which require additional time to properly address in an answering brief, in particular, the failure of the Administrative Law Judge

to award attorneys' fees and litigation expenses to the Charging Party. This issue has not been briefed previously in this case.

4. The press of other business including previously scheduled Ohio Workers' Compensation administrative hearings involving Respondent's Counsel working on this matter would make it difficult for Respondent's Counsel to properly address the cross-exceptions filed by Counsel for the Acting General Counsel by the current due date of February 1, 2013.

5. Counsel for the Acting General Counsel has been advised of this motion and has no objection to the Board granting this motion for an extension of time to February 15, 2013.

Wherefore, Counsel for Respondent requests an extension of time until February 15, 2013 to file an answering brief to Counsel for the Acting General Counsel's cross-exceptions to the decision of the Administrative Law Judge.

Dated at Cincinnati, Ohio this 24<sup>th</sup> day of January 2013.

Respectfully submitted,

/s/ Raymond D. Neusch  
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**CERTIFICATE OF SERVICE**

I hereby certify that a true and complete copy of the foregoing has been filed electronically and has been served upon the following individuals, electronically and by regular U.S. mail, this 24<sup>th</sup> day of January, 2013:

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