

STATES OF AMERICA
BEFORE THE NATIONAL LABOR RELATIONS BOARD
REGION 9

In the Matter of

VOITH INDUSTRIAL SERVICES, INC.

and

GENERAL DRIVERS, WAREHOUSEMEN &
HELPERS, LOCAL UNION NO. 89, AFFILIATED
WITH THE INTERNATIONAL BROTHERHOOD
OF TEAMSTERS

Cases 9-CA-075496

9-CA-078747

9-CA-082437

and

UNITED AUTOMOTIBLE, AEROSPACE AND
AGRICULTURAL IMPLEMENT WORKERS
OF AMERICA, AFL-CIO

and

UNITED AUTOMOBILE, AEROSPACE AND
AGRICULTURAL IMPLEMENT WORKERS
OF AMERICA, LOCAL UNION NO. 862, AFL-CIO

And

GENERAL DRIVERS, WAREHOUSEMEN &
HELPERS, LOCAL UNION 89, AFFILIATED
WITH THE INTERNATIONAL BROTHERHOOD
OF TEAMSTERS

9-CB-0755075

9-CB-082805

**RESPONDENT, VOITH INDUSTRIAL SERVICES, INC.'S,
MOTION TO EXCEED THE BRIEFING LIMIT OF 50 PAGES**

Pursuant to Sections 102.46(j) and 102.47 of the Board's Rules and Regulations, Respondent, Voith Industrial Services, Inc. ("Voith"), respectfully requests leave to exceed the 50-page limit for its brief in support of its exceptions to Administrative Law Judge Bruce D.

Rosenstein's decision in this matter. Under Section 102.46(j), briefs in support of exceptions and answering briefs may be no longer than 50 pages unless permission to exceed is obtained from the Board. Voith requests an additional 30 pages for its brief. It does so for the following reasons:

First, the issues underlying the the Administrative Law Judge's decision are numerous and complex. That decision addressed five ULP charges filed against Voith and United Auto Workers and its Local 862, which asserted multiple violations of the National Labor Relations Act, including violations of Sections 8(a)(1), (2), (3) and (5), 8(b)(1)(A), and 8(b)(2), as well as multiple affirmative defenses asserted by both Voith and United Auto Workers.

Second, the record in this case is extensive. The Administrative Law Judge conducted thirteen days of hearing, which generated more than 3,125 pages of transcript. The parties called 37 witnesses and introduced more than 170 exhibits consisting of several hundred pages.

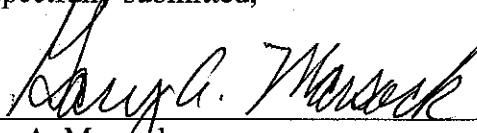
The complexity and numerosity of the issues is reflected in length of the parties' post-hearing briefs submitted to Administrative Law Judge Rosenstein: Voith's – 106 pages and General Counsel's – 77 pages. Moreover, Administrative Law Judge Rosenstein's decision consisted of 34, single-spaced pages. In order for Voith to thoroughly and appropriately address the voluminous record and multiple issues at the exceptions stage, as it did in its post-hearing brief, it requires considerably more than the 50 pages normally permitted by the Board's Rules and Regulations.

Accordingly, Voith respectfully requests permission to exceed the page limit by thirty (30) additional pages, providing it with eighty (80) pages for its brief in support of its exceptions to the Administrative Law Judge's decision.

Dated this 14th day of February, 2013.

Respectfully submitted,

By:



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CERTIFICATE OF SERVICE

I certify that a copy of the foregoing Respondent, Voith Industrial Services, Inc.'s, Motion to Exceed the Briefing Limit of 50 pages was served upon the National Labor Relations Board by electronic filing in PDF format using the Agency's E-filing system on this 14th day of February, 2014.

I further certify that a copy of the foregoing was served upon the following by email in accordance with CFR 102.11(4) on this 14th day of February, 2014:

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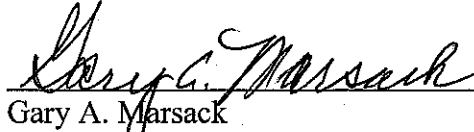
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