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Littler Mendelson, PC
501 W. Broadway
Suite 900
San Diego, CA 92101.3577

Rosa Dyer
619.515.1845 direct
619 232.0441 main
619.232.4302 fax
rdyer@littler.com

April 25, 2013

VIA FEDERAL EXPRESS

Executive Secretary
National Labor Relations Board
1099 14th Street, N.W.
Washington, D.C. 20570-0001

Re: *Prime Healthcare Centinela, LLC dba Centinela Hospital Medical Center*
Case Nos. 31-CA-030055, 31-CA-030091, 31-CA-068109, 31-CA-072675

Dear Sir/Madam:

Enclosed for filing with the Board in the above-referenced matter are the original and seven copies of the *Respondent Prime Healthcare Centinela, LLC dba Centinela Hospital Medical Center's Request For A Thirty (30) Day Extension Of Time To File Exceptions.* An extra copy of said document is also enclosed for conforming and returning to us in the envelope provided.

Thank you for your cooperation. Should you have any questions, please do not hesitate to call.

Very truly yours,

Rosa Dyer
Secretary to
Theodore R. Scott

rd
Enclosures

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UNITED STATES OF AMERICA
BEFORE THE NATIONAL LABOR RELATIONS BOARD
Washington, D.C.

PRIME HEALTHCARE CENTINELA, LLC dba CENTINELA HOSPITAL MEDICAL CENTER, Respondent, and SEIU-UNITED HEALTHCARE WORKERS - WEST, Charging Party.	Cases 31-CA-030055 31-CA-030091 31-CA-068109 31-CA-072675

RESPONDENT PRIME HEALTHCARE CENTINELA, LLC dba CENTINELA HOSPITAL MEDICAL CENTER'S REQUEST FOR A THIRTY (30) DAY EXTENSION OF TIME TO FILE EXCEPTIONS

Pursuant to Section 102.46 of the Board's Rules and Regulations, 29 CFR § 102.46, Respondent respectfully requests an extension of thirty (30) days in which the parties may file exceptions to the ALJ's Decision ("Decision"). In support of this request Respondent shows as follows:

1. The Decision was issued on April 12, 2013. However, the undersigned counsel for Respondent, who will be almost exclusively responsible for preparing Respondent's exceptions to the Decision and supporting brief, was out of the country at that time and did not return to his office and receive a copy of the Decision until April 23, 2013, eleven days after the Decision was issued. Moreover, because of the press of other matters, including representation of the employer regarding a pending representation petition in Case 21-RC-097525, counsel has only had the opportunity to quickly review the Decision as of the filing of this Request.

2. The Decision is 42 single-spaced pages long (not including the table of contents and appendix) and addresses allegations relating to bargaining between the parties over

more than 24 months and involving more than 18 separate bargaining sessions, as well as voluminous written communications between the parties. The transcript from the hearing consumes 690 pages and thousands of pages of documents were submitted as exhibits. Because of the voluminous record the parties were provided with an additional 40 days in which to file their post-hearing briefs.

3. As noted, the undersigned counsel for Respondent, who also represented Respondent at the hearing before the ALJ, will be almost exclusively responsible for preparing Respondent's exceptions and supporting brief. Due to the voluminous nature of the record, the significance of the issues raised by the Decision and counsel's responsibilities to other clients, counsel will not have sufficient time to prepare the exceptions and brief prior to the current due date of May 10, 2013. However, counsel believes that if Respondent's request for a 30-day extension is granted, he should have sufficient time to prepare exceptions and a supporting brief that will assist the Board in considering the issues raised by the Decision.

4. Prior to preparing this request the undersigned counsel contacted counsel for the Acting General Counsel and counsel for the Charging Party Union to advise that Respondent would be asking for a 30-day extension. Counsel for the Acting General Counsel advised both the undersigned and counsel for the Union that he did not oppose a two week extension but did oppose 30 days. Counsel for the Union subsequently communicated that the Union did not oppose a two week extension. Neither explained the basis for their opposition to a 30 day extension.

WHEREFORE, it is respectfully requested that the period in which the parties may file exceptions/supporting briefs to the Decision be extended for 30 days, to JUNE 3, 2013.[1]

Dated: April 25, 2013

Respectfully submitted,

THEODORE R. SCOTT
LITTLER MENDELSON, P.C.
501 W. Broadway, Suite 900
San Diego, CA 92101.3577
Telephone: 619.515-1837 [Direct]
Facsimile: 619.615.2261 [Direct]
Telephone: 619.232.0441 [Main]
Facsimile: 619.232.4302 [Main]
Attorneys for Respondent
PRIME HEALTHCARE CENTINELA, LLC
dba CENTINELA HOSPITAL MEDICAL
CENTER

[1] The 30th day after the current due date of May 10, 2013 falls on June 2, 2013, a Sunday.

Prime Healthcare Centinela, LLC
dba Centinela Hospital Medical Center

Cases 31-CA-030055, 31-CA-030091
31-CA-068109, 31-CA-072675

PROOF OF SERVICE BY MAIL

I am employed in San Diego County, California. I am over the age of eighteen years and not a party to the within-entitled action. My business address is 501 W. Broadway, Suite 900, San Diego, California 92101.3577. I am readily familiar with this firm's practice for collection and processing of correspondence for mailing with the United States Postal Service. On April 25, 2013, I placed with this firm at the above address for deposit with the United States Postal Service a true and correct copy of the within documents:

RESPONDENT PRIME HEALTHCARE CENTINELA, LLC DBA CENTINELA HOSPITAL MEDICAL CENTER'S REQUEST FOR A THIRTY (30) DAY EXTENSION OF TIME TO FILE EXCEPTIONS

in a sealed envelope, postage fully paid, addressed as follows:

Monica Guizar, Esq.
Weinberg, Roger & Rosenfeld
800 Wilshire Boulevard, Suite 1320
Los Angeles, CA 90017-2607

E-Mail: mguizar@unioncounsel.net
Phone: (213) 380-2344
Fax: (213) 443-5098

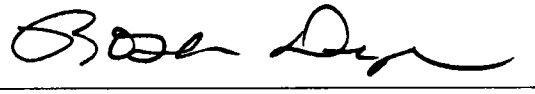
John Rubin, Esq.
National Labor Relations Board, Region 31
11150 W. Olympic Boulevard, Suite 700
Los Angeles, CA 90064-1824

E-Mail: john.rubin@nlrb.gov
Phone: (310) 235-7632
Fax: (310) 235-7420

Following ordinary business practices, the envelope was sealed and placed for collection and mailing on this date, and would, in the ordinary course of business, be deposited with the United States Postal Service on this date.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on April 25, 2013, at San Diego, California.



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