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

PRIME HEALTHCARE CENTINELA, LLC dba CENTINELA HOSPITAL MEDICAL CENTER, Respondent, v. 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 MOTION FOR PERMISSION TO EXCEED 50 PAGE LIMIT ON BRIEF IN SUPPORT OF EXCEPTIONS TO THE DECISION OF THE ADMINISTRATIVE LAW JUDGE

Pursuant to Section 102.46(j) of the Board's Rules and Regulations, 29 CFR § 102.46(j), Respondent Prime Healthcare Centinela, LLC dba Centinela Hospital Medical Center ("Respondent") hereby requests permission to exceed the 50 page limitation on briefs filed in support of exceptions to the decision of an administrative law judge and to file a brief in support of exceptions not to exceed 125 pages. In support hereof Respondent shows as follows:

1. The complaint in this matter alleges bad faith bargaining during a period of more than 24 months. The hearing in this matter required five days of testimony. The record includes over 740 pages of transcript and over 200 exhibits consuming several thousand pages.

2. Acting General Counsel's post-hearing brief was over 75 pages, excluding tables. Respondent's post-hearing brief was 67 pages, excluding tables.

3. The ALJ's decision is 42 single-spaced pages and finds in favor of the Acting General Counsel on all unfair labor practices alleged in the complaint, as well as violations not alleged in the complaint. Moreover, the decision contains no discussion of large portions of the record that will be necessary for full consideration of Respondent's exceptions.

Additionally, Respondent's exceptions will include numerous exceptions to rulings made by the ALJ during the course of the hearing that are not referenced in the ALJ's decision, exceptions to the ALJ's rulings on post-hearing motions that are not addressed in the ALJ's decision, and exceptions to the manner in which the ALJ otherwise conducted the hearing. All of these exceptions are required to be addressed in Respondent's exceptions brief pursuant to Section 102.46 of the Board's rules.

4. Respondent's counsel anticipates that Respondent will need at least 120 pages to adequately explain the basis for its exceptions to the findings and conclusions set forth in the ALJ's decision, as well as its exceptions to numerous rulings made by the ALJ during the course of the hearing and on post-hearing motions, and the manner in which the ALJ conducted the hearing.

WHEREFORE, it is respectfully requested that permission be granted for Respondent to file a brief in support of its exceptions of up to 125 pages.

Dated: May 28, 2013

Respectfully submitted,

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

PROOF OF SERVICE BY E-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. On May 28, 2013, I served a true and correct copy of the within document(s):

RESPONDENT PRIME HEALTHCARE CENTINELA, LLC DBA CENTINELA HOSPITAL MEDICAL CENTER'S MOTION FOR PERMISSION TO EXCEED 50 PAGE LIMIT ON BRIEF IN SUPPORT OF EXCEPTIONS TO THE DECISION OF THE ADMINISTRATIVE LAW JUDGE

by e-mailing the document(s) to the following person(s) at the e-mail address(es) listed below:

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

Executed on May 28, 2013, at San Diego, California.

Theodore R. Scott