

UNITED STATES OF AMERICA
BEFORE THE NATIONAL LABOR RELATIONS BOARD
Region 31

PRIME HEALTHCARE CENTINELA, LLC dba
CENTINELA HOSPITAL MEDICAL CENTER

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

and

SEIU-UNITED HEALTHCARE WORKERS -
WEST

**COUNSEL FOR THE ACTING GENERAL COUNSEL'S MOTION TO FILE
OVERSIZE ANSWERING BRIEF TO RESPONDENT'S EXCEPTIONS AND
BRIEF IN SUPPORT**


Pursuant to Section 102.46 of the National Labor Relations Board's Rules and Regulations, Series 8, as amended Counsel for the General Counsel moves for permission to file a brief not to exceed 200 pages in answer to Respondent's exceptions and brief in support thereof.

On April 12, 2013, Administrative Law Judge Gerald M. Etchingham issued his recommended decision in this matter. On May 28, 2013, Prime Healthcare Centinela, LLC d/b/a Centinela Hospital Medical Center ("the Respondent") moved for permission to file a brief up to 125-pages in length in support of its exceptions. On June 6, 2013, the Associate Executive Secretary granted Respondent's motion to exceed the page limitation, allowing a brief not to exceed 125 pages. On June 14, 2013, Respondent filed 160 exceptions consisting of 35 pages, a 117-page brief in support of its exceptions, and

an “offer of proof” consisting of about 122 pages. Overall, Respondent’s submission consists of about 263 pages.

In light of the above, Counsel for the General Counsel moves for permission to file an oversize brief, not to exceed 200 pages, in answer to Respondent’s exceptions based upon the length of the recommended decision and order, the voluminous record, the quantity of exceptions filed and the length of Respondent’s brief and offer of proof in support of its exceptions.

Dated at Los Angeles, California, this 9th day of July, 2013.



John Rubin
Counsel for the General Counsel

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

CERTIFICATE OF SERVICE

I hereby certify that a copy of the COUNSEL FOR THE ACTING GENERAL COUNSEL'S MOTION TO FILE OVERSIZE ANSWERING BRIEF TO RESPONDENT'S EXCEPTIONS AND BRIEF IN SUPPORT was served on the 9th day of July, 2013:

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