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

UNITED PARCEL SERVICE
OF AMERICA, INC.

and **Cases** **16-CA-028064**
16-CA-062316
16-CA-070588
16-CA-081494
16-CA-085218

INTERNATIONAL BROTHERHOOD OF
TEAMSTERS, LOCAL UNION 373

MOTION REQUESTING PERMISSION TO EXCEED 50 PAGE LIMIT WHEN FILING EXCEPTIONS TO THE DECISION OF THE ADMINISTRATIVE LAW JUDGE

COMES NOW, Linda M. Reeder, Counsel for the Acting General Counsel, and pursuant to Section 102.46 of the Board's Rules and Regulations submits this Motion Requesting Permission to Exceed 50-Page Limit When Filing Exceptions to the Decision of the Administrative Law Judge. In support of said Motion, Counsel for the Acting General Counsel offers the following:

1.

Administrative Law Judge Keltner W. Locke issued his Decision on August 15, 2013. The due date for the filing of exceptions and a brief in support thereof is October 16, 2013. In a 63-page decision, the Judge dismissed over 20 information requests. Most of these requests contained as many as seven subparts. The Judge also reinstated a settlement agreement, which was set aside by the Regional Director.

2.

Section 102.46(j) of the Rules and Regulations of the National Labor Relations Board requires that Exceptions and Briefs may not exceed 50 pages in length.

3.

Fully addressing the number of dismissed allegations along with the issue concerning the propriety of reinstating a settlement agreement will require a response that exceeds the 50-page limit found in Section 102.46(j).

3.

Counsel for the Acting General Counsel has attempted to reach the Charging Party to ascertain its position concerning this Motion, but has not obtained the Charging Party's position as of the time of filing. Counsel for Respondent does not oppose this Motion.

4.

Based upon the foregoing, Counsel for the Acting General Counsel respectfully requests that she be permitted to exceed the 50-page limit for Exceptions.

DATED at Fort Worth, Texas, this 20th day of September 2013.

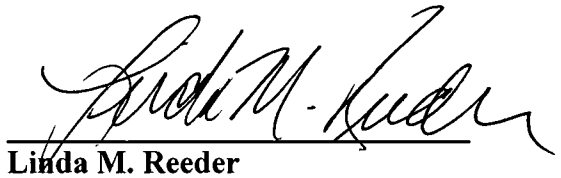
Linda M. Reeder
Counsel for the Acting General Counsel
National Labor Relations Board
Region 16
Room 8A24, Federal Office Bldg.
819 Taylor Street
Fort Worth, Texas 76102

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Counsel for the Acting General Counsel's Motion Requesting Permission to Exceed 50 Page Limit When Filing Exceptions to the Decision of the Administrative Law Judge has been served this 20th day of September 2013, by electronic mail:

Aron Karabel, Esq.
Marcus Crider, Esq.
Waller Lansden Dortch & Davis, LLP
511 Union Street, Suite 2700
Nashville, TN 37219
Aron.karabel@wallerlaw.com
Marcus.crider@wallerlaw.com

Mr. Reginald Thomas
2305 Pecan Street
Texarkana, AR 71854
Redthomas77@hotmail.com



Linda M. Reeder
Counsel for the Acting General Counsel
National Labor Relations Board
Region 16
819 Taylor Street, Room 8A24
Fort Worth, TX 76102-6178