

UNITED STATES OF AMERICA
NATIONAL LABOR RELATIONS BOARD
THIRTIETH REGION

URS ENERGY & CONSTRUCTION, INC.,

Respondent,

And

Case No. 30-CA-18775

TIMOTHY PARE,

Charging Party.

**RESPONDENT URS ENERGY & CONSTRUCTION, INC.'S
REQUEST FOR ORAL ARGUMENT**

Pursuant to Section 102.46(i) of the National Labor Relations Board's Rules and Regulations, Respondent URS Energy & Construction, Inc. ("URS") hereby requests oral argument in front of the National Labor Relations Board related to the Exceptions to the Decision of the Administrative Law Judge that it has simultaneously filed on October 7, 2011.

Separate and apart from the importance of the case to the parties, because the matter involves a construction industry standard and accepted practice of selecting an engineer for layoff based on the machine on which the operator is assigned, it raises important issues that go beyond the individual laid off in this case.

Respectfully submitted this 7th day of October, 2011.

ROBERT H. DUFFY
State Bar No. 1010996
COURTNEY R. HEEREN
State Bar No. 1066153



QUARLES & BRADY LLP
411 East Wisconsin Avenue
Milwaukee WI 53202
414.277.5000
Attorneys for Defendant
URS Energy & Construction, Inc.

Direct Inquiries To:

Courtney R. Heeren

Ph: 414.277.3071

Fax: 414.978.8896

Email: courtney.heeren@quarles.com