

**UNITED STATES OF AMERICA
BEFORE THE NATIONAL LABOR RELATIONS BOARD**

RITZ-CARLTON WATER TOWER)
PARTNERSHIP,)
)
Charging Party,)
)
and)
UNITE HERE LOCAL 1,)
)
Respondent.)

Case No.: 13-CB-19622

RITZ-CARLTON'S UNOPPOSED MOTION FOR EXTENSION OF TIME

The Ritz-Carlton Water Tower Partnership (the "Hotel"), by its counsel, Franczek Radelet P.C., moves for a brief extension of its deadline to file its Response to the Union's Exceptions to the Decision of the Administrative Law Judge. In support of this motion, the Hotel states:

1. On November 29, 2011, the ALJ issued his decision in this matter. Pursuant to Section 102.46(a) of the Board's Rules and Regulations, the deadline to file exceptions to that decision was December 27, 2011.
2. On December 21, 2011, Respondent UNITE HERE Local 1 (the "Union") filed its exceptions to the decision.
3. Section 102.46(d)(1) provides that within 14 days "or such further period as the Board may allow" from the December 27 deadline to file exceptions, any party opposing the exceptions may file a responsive brief. Accordingly, answers to the Union's exceptions are due on or before January 10, 2012.

4. Due to the recent holidays and obligations in several other pending state and federal court matters, the Hotel's counsel respectfully requests a brief extension of the Hotel's response deadline by twenty-one days, or until January 31, 2011.

5. The requested extension will not cause undue delay or prejudice the other parties in any way.

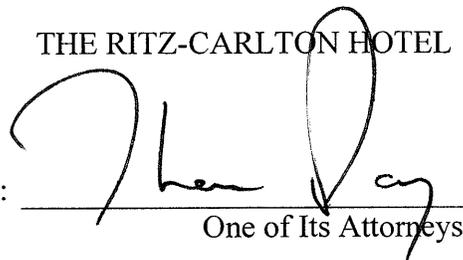
6. One of the Union's counsel, Kristin Martin, has advised the Hotel's counsel, Thomas Posey, that the Union does not oppose the Hotel's extension request, so long as the Union's deadline to reply to the Hotel's brief will be on the same date as its deadline to reply to the General Counsel's anticipated response brief. Kevin McCormack, Counsel for the General Counsel, has advised the parties that he intends to file a response brief and anticipates seeking a 14-day extension of his response deadline.

WHEREFORE, for the foregoing reasons, the Ritz-Carlton Hotel respectfully requests that the Board extend its deadline to file its Response to the Union's Exceptions to the Decision of the Administrative Law Judge until January 31, 2012.

Respectfully submitted,

THE RITZ-CARLTON HOTEL

By: _____



One of Its Attorneys

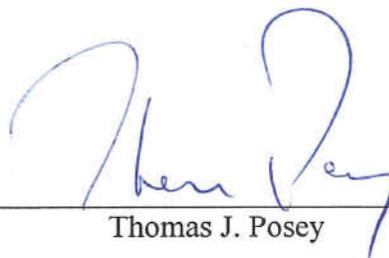
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Dated: January 5, 2012

CERTIFICATE OF SERVICE

I hereby certify that on January 5, 2012, I electronically filed the foregoing **RITZ-CARLTON'S MOTION FOR EXTENSION OF TIME** with the National Labor Relation Board. I further certify that a copy of the foregoing was served upon the parties listed below by email delivery and by depositing a true and correct copy of same, postage prepaid, in the U.S. Mail chute at 300 South Wacker Drive, Chicago, Illinois, on this 5th day of January, 2012:

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