

**UNITED STATES OF AMERICA  
BEFORE THE NATIONAL LABOR RELATIONS BOARD  
REGION 34**

---

HEALTHBRIDGE MANAGEMENT, LLC; 107 OSBORNE STREET OPERATING COMPANY II, LLC D/B/A DANBURY HEALTH CARE CENTER; 710 LONG RIDGE ROAD OPERATING COMPANY II, LLC D/B/A LONG RIDGE OF STAMFORD; 240 CHURCH STREET OPERATING COMPANY II, LLC D/B/A NEWINGTON HEALTH CARE CENTER; 1 BURR ROAD OPERATING COMPANY II, LLC D/B/A WESTPORT HEALTH CARE CENTER; 245 ORANGE AVENUE OPERATING COMPANY II, LLC D/B/A WEST RIVER HEALTH CARE CENTER; 341 JORDAN LANE OPERATING COMPANY II, LLC D/B/A WETHERSFIELD HEALTH CARE CENTER	Case Nos.	34-CA-12715 34-CA-12732 34-CA-12765 34-CA-12766 34-CA-12767 34-CA-12768 34-CA-12769 34-CA-12770 34-CA-12771
---	-----------	---

And

NEW ENGLAND HEALTH CARE EMPLOYEES  
UNION, DISTRICT 1199, SEIU, AFL-CIO

---

**MOTION FOR EXTENSION OF TIME TO FILE ANSWERING BRIEF TO COUNSEL  
FOR THE ACTING GENERAL COUNSEL'S LIMITED CROSS-EXCEPTION  
TO THE DECISION OF THE ADMINISTRATIVE LAW JUDGE**

---

Pursuant to Section 102.46(f)(2) of the Board's Rules and Regulations, as amended, the Respondents, through counsel, move for an extension of time to file an answering brief to Counsel for the Acting General Counsel's Limited Cross-Exception to the Decision of the Administrative Law Judge, stating as follows:

1. On October 10, 2012, Counsel for the Acting General Counsel ("AGC") filed an Answering Brief to Respondent's Exceptions to the Decision of the Administrative Law Judge, as well as a Limited Cross-Exception to the Decision of the Administrative Law Judge and Brief in Support.

2. Pursuant to Section 102.46(h) of the Board's Rules and Regulations, Respondents have 14 days in which to file a reply brief to the AGC's Answering Brief and there is no possibility of extending this time period.

3. Pursuant to Section 102.46(f)(1), Respondents also have 14 days in which to file an answering brief to the AGC's Limited Cross-Exception. However, the Rules and Regulations provide that Respondents may request an extension of time to file an answering brief. See Section 102.46(f)(2).

4. While the AGC's Limited Cross-Exception is not lengthy, Respondents anticipate needing the entire 14-day period to draft their reply to the multiple issues and arguments raised in the AGC's Answering Brief, which will not leave sufficient time to answer the AGC's Limited Cross-Exception.

5. Accordingly, Respondents request an extension of time to file an answering brief to the AGC's Limited Cross-Exception to Monday, November 5, 2012.

6. Counsel for the Acting General Counsel has stated that he cannot consent to the requested extension of time to file an answering brief to the AGC's Limited Cross-Exception. Counsel for Charging Party did not respond to Respondents' request for its position on the requested extension.

WHEREFORE, PREMISES CONSIDERED, and for good cause shown, Respondents request that their Motion for Extension of Time to File an Answering Brief to Counsel for the Acting General Counsel's Limited Cross-Exception to the Decision of the Administrative Law Judge be granted, and that the date be extended to and including Monday, November 5, 2012.

Respectfully submitted,

A handwritten signature in blue ink that reads "Steven W. Likens". The signature is written in a cursive style and is positioned above a horizontal line.

George W. Loveland, II  
Steven W. Likens  
Amber Isom-Thompson  
Littler Mendelson, P.C.  
3725 Champion Hills Drive, Suite 3000  
Memphis, TN 38125  
901-795-6695

## CERTIFICATE OF SERVICE

The undersigned hereby certifies that copies of the aforesaid Motion for Extension of Time to File an Answering Brief to Counsel for the Acting General Counsel's Limited Cross-Exception to the Decision of the Administrative Law Judge were served on October 11, 2012, in the manner set forth below:

Lester A. Heltzer, Executive Secretary  
National Labor Relations Board  
1099 14th St. N.W.  
Washington, D.C. 20570-0001

E-filing

Thomas E. Quigley  
Margaret A. Lareau  
John A. McGrath  
Counsel for the Acting General Counsel  
NLRB - Region 34  
A.A. Ribicoff Federal Building  
450 Main Street, Suite 410  
Hartford, Connecticut 06103  
[Thomas.Quigley@nlrb.gov](mailto:Thomas.Quigley@nlrb.gov), [Margaret.Lareau@nlrb.gov](mailto:Margaret.Lareau@nlrb.gov)  
[John.McGrath@nlrb.gov](mailto:John.McGrath@nlrb.gov)

E-Mail

Kevin A. Creane, Esq.  
Law Firm of John M. Creane  
92 Cherry Street  
P.O. Box 170  
Milford, Connecticut 06460  
[KACreane@aol.com](mailto:KACreane@aol.com)

E-Mail

  
\_\_\_\_\_  
Steven W. Likens