

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

M&J BUS, INC.

and

UNITED FOOD AND COMMERCIAL
WORKERS UNION, LOCAL 1459

Case 01-CA-110383

**MOTION FOR EXTENSION OF TIME TO FILE
EXCEPTIONS BRIEF TO THE BOARD**

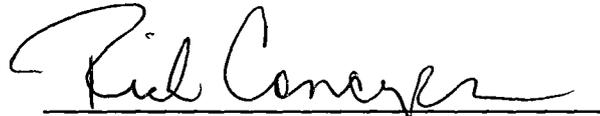
Counsel for the General Counsel requests a four-week extension of time, from March 4, 2015 until April 6, 2015, for the filing of his Exceptions brief with the Board in the above-captioned case. The additional time is requested based on the following facts: On September 19, 2014, Administrative Law Judge Steven Davis issued his decision finding that Respondent: 1) violated Section 8(a)(5) by failing to recognize and bargain with the Charging Party Union; 2) violated Section 8(a)(3) by failing to hire two employees; and 3) did not violate Section 8(a)(5) by unilaterally implementing new terms and conditions of employment beginning on or about July 1, 2013. On September 22, 2014, United States District Court Judge Warren Eginton granted the General Counsel's request for injunctive relief pursuant to Section 10(j) of the Act regarding the first two above allegations. On or about October 1, 2014, Respondent agreed to immediately recognize and bargain a new contract with the Charging Party Union and offer immediate reinstatement to the two employees at issue, leaving the unilateral change issue as the lone pending matter. Currently, the parties are purportedly in the final phases of reaching agreement.

Based on the foregoing, a month-long extension of time is requested because the bargaining between the parties may lead to an agreement that would obviate the

need to file any Exceptions. Neither the Charging Party nor Respondent objects to this request.

Dated at Hartford, Connecticut, this 4th day of March, 2015.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Rick Concepcion". The signature is written in a cursive style and is positioned above a horizontal line.

Rick Concepcion
Counsel for the General Counsel
National Labor Relations Board
Region One, Subregion 34
Hartford, Connecticut

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the aforesaid *Motion for Extension of Time to File Exceptions Brief to the Board*, were served on March 5, 2015, in the manner set forth below:

Gary W. Shinnors, Executive Secretary
National Labor Relations Board
1099 14th St. N.W.
Washington, D.C. 20570

E-filing on Agency Website

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Terri L. Gupton

Gupton, Terri L.

From: Gupton, Terri L.
Sent: Wednesday, March 04, 2015 4:40 PM
To: 'greene@Halloran-Sage.Com'; 'drome@pylerome.com'
Cc: Concepcion, Rick
Subject: M&J Bus, Inc. 01-CA-110383
Attachments: EOT.01-CA-110383 Extension of Time 3-4-15.docx

Sensitivity: Personal

Flag Status: Completed

Tracking:	Recipient	Read
	'greene@Halloran-Sage Com'	
	'drome@pylerome.com'	
	Concepcion, Rick	Read: 3/4/2015 4:40 PM

Attached please find a copy of the Extension of Time to file Exceptions Brief to the Board, which is being e-filed today.

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