



LABOR AND EMPLOYMENT LAW
ON BEHALF OF MANAGEMENT
AND RELATED LITIGATION

500 NORTH BRAND BOULEVARD
TWENTIETH FLOOR
GLENDALE, CALIFORNIA 91203-9946

TELEPHONE:
818-508-3700

FACSIMILE:
818-506-4827
E-MAIL:
jgomez@brgslaw.com
(818) 508-3710 (direct)
(818) 506-4827 (fax)

VIA ELECTRONIC FILING

April 23, 2015

VIA E-FILE

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

Re: Green Fleet Systems, LLC and International Brotherhood of Teamsters, Port
Division, Cases 21-CA-100003, 21-CA-115910, 21-CA-119154, 21-CA-121368

Dear Mr. Shinnars:

Pursuant to Section 102.46(a) of the Board's Rules and Regulations, as amended, on behalf of the Respondent Green Fleet Systems, LLC ("Employer"), we are submitting this request for an extension of time to file Exceptions to the Administrative Law Judge's April 9, 2015 Decision. The Employer is seeking to retain our firm as counsel in the above matter. At present, the Employer is in Chapter 11 Bankruptcy. We have been advised by the Employer's bankruptcy counsel that by law the Employer/Debtor may not legally engage counsel without the approval of the Bankruptcy Court. Indeed, Court approval is necessary for the Debtor (Employer) to retain any professionals, including attorneys. Moreover, bankruptcy counsel advises that the automatic stay provisions of bankruptcy law are inapplicable to these proceedings. Thus, the time for Employer to file its Exceptions is running, even though the Employer is precluded from engaging counsel. In order for the Employer to obtain permission to retain our firm as counsel, a special motion before the Bankruptcy Court must be filed. The name of that motion is "Application of Debtor and Debtor In Possession To Employ Ballard Rosenberg Golper & Savitt As Special Litigation Counsel." Bankruptcy counsel intends to file this motion tomorrow, April 24, and has informed us that this motion generally requires 14 days' notice to the other creditors, such that the permission to retain counsel will not be received before May 7, 2015, the deadline for the Employer to file Exceptions. Thus, we respectfully request an additional 28 days from the date the Bankruptcy Court approves the Application, to file Exceptions.

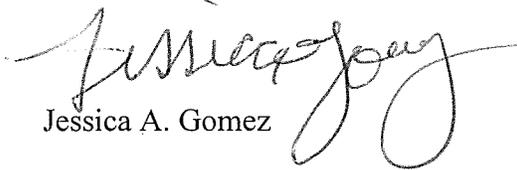
We have contacted Counsel for the Charging Party regarding this matter and have been advised that the Charging Party does not oppose this request. We were unable to reach the Counsel for the General Counsel.

Gary Shiners
April 23, 2015
Page 2

Please do not hesitate to contact the undersigned with any questions. Thank you for your courtesy and consideration in this matter.

Very truly yours,

BALLARD ROSENBERG GOLPER & SAVITT, LLP


Jessica A. Gomez

JAG

cc: Richard R. Rosenberg, Esq.
Lisa E. McNeill, Esq.
Cecelia Valentine, Esq.
Julie Gutman-Dickinson, Esq.
Hector De-Haro, Esq.

Gary Shiners
April 23, 2015
Page 3

Statement of Service

Pursuant to Section 102.114(i) of the Board's Rules and Regulations, I certify that this document was timely served on all parties. On April 23, 2015, the document was filed electronically and served by electronic mail (email) to the parties.

Lisa E. McNeill
Counsel for the General Counsel
National Labor Relations Board, Region 21
888 South Figueroa Street, 9th Floor
Los Angeles, CA 90017-5449
Telephone 213-894-5215
Fax 213-894-2778
E-mail: lisa.mcneill@nlrb.gov

Cecelia Valentine
Counsel for the General Counsel
National Labor Relations Board, Region 21
888 South Figueroa Street, 9th Floor
Los Angeles, CA 90017-5449
Phone Number: (213) 894-6145
Fax Number: (213) 894-2778
E-mail: cecelia.valentine@nlrb.gov

Julie Gutman-Dickinson
Counsel for the Charging Party
500 N. Central Ave, Suite 800
Glendale, CA 91203
Phone: (818) 973-3228
Fax: (818) 973-3201
Email: jgutmandickinson@bushgottlieb.com

Hector De-Haro
Counsel for the Charging Party
500 N. Central Ave, Suite 800
Glendale, CA 91203
Phone: (818) 973-3200
Fax: (818) 973-3201
Email: hdeharo@bushgottlieb.com

I declare under penalty of perjury that the foregoing is true and correct under the laws of the United State of America.



Jessica A. Gomez