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May 26, 2016

Office of the Executive Secretary
National Labor Relations Board
1015 Half Street, S.E.
Washington, DC 20570

Administrative Law Judge Kenneth W. Chu
United State of America
National Labor Relations Board
120 West 45th Street-11th Floor
New York, New York 10036-5503

RE: Sprainbrook Manor Rehab LLC, et al., adv. 1199 SEIU United Healthcare
Workers East
Case Numbers: 02-CA-089480
02-CA-142506
02-CB-095670
02-CB-146895

Dear Sirs/Madam:

I represent Respondent, Budget Services, Inc. ("Budget"). I refer to the Decision of the Honorable Kenneth W. Chu, Administrative Law Judge, dated April 29, 2016 and to the Order transferring proceedings to the National Labor Relations Board dated April 29, 2016.

Pursuant to the terms of the Order, exceptions to the Decision must be received on or before May 27, 2016. I am advised by counsel for Sprain Brook Manor Rehab, LLC ("Sprainbrook") that Sprainbrook and 1199 SEIU United Healthcare Workers East, the Charging Party, have negotiated and apparently arrived at an agreement in principle for the resolution of all of the issues in this case, which has been submitted to, and received tentative approval, from the staff at Region 2. I am further advised that a draft Agreement of Settlement is circulating and is the subject of ongoing discussions and negotiations.

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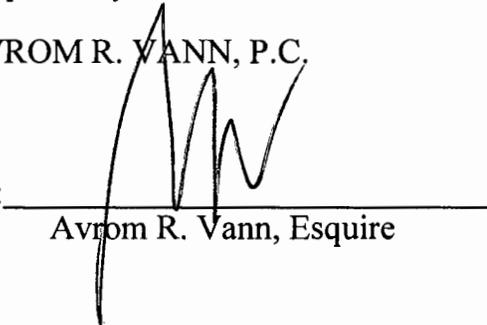
In these circumstances, to avoid burdening Budget with the cost and expenses of having to file exceptions at this point in time, which if the settlement is implemented I am told are likely to become moot, I respectfully request a sixty (60) day extension of the time for the filing of Exceptions.

Please excuse the lateness of the submission of this request (see Section 102.46(a)). I had been aware of the fact that settlement negotiations were in progress and I sought to obtain an update and status of these negotiations early this week. Counsel for Sprainbrook was unavailable and only yesterday were he and I able to speak at which time he provided this update to me. I respectfully submit that no party will be prejudiced by the delay in submitting this request for the extension and in fact deferring the filing of exceptions will avoid interposing any adverse issues which might impede the progress of settlement negotiations.

Respectfully Submitted,

AVROM R. VANN, P.C.

By:


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