

**UNITED STATES OF AMERICA  
BEFORE THE NATIONAL LABOR RELATIONS BOARD  
REGION 28**

TRUMP RUFFIN COMMERCIAL, LLC,  
d/b/a TRUMP INTERNATIONAL HOTEL  
LAS VEGAS,

Respondent,

and

LOCAL JOINT EXECUTIVE BOARD OF  
LAS VEGAS, affiliated with UNITE HERE  
INTERNATIONAL UNION,

Charging Party.

Case Nos. 28-CA-177639  
28-CA-177647  
28-CA-179488

**RESPONDENT TRUMP RUFFIN COMMERCIAL, LLC'S  
MOTION TO RESCHEDULE HEARING**

Respondent Trump Ruffin Commercial, LLC, d/b/a Trump International Hotel Las Vegas (“Respondent”), pursuant to Section 102.16 of the National Labor Relations Board’s Rules and Regulations, hereby moves to reschedule the hearing in the above-referenced matter, which is currently scheduled to commence on Tuesday, November 29, 2016 and continue on consecutive days thereafter until concluded. Respondent respectfully requests that the hearing be rescheduled to the week of February 6, 2017, or any week thereafter during the month of February 2017.

Respondent makes this request for good cause. Specifically, Respondent’s counsel and representative of record, Matthew J. Cute, will be unavailable from November 28, 2016 through approximately December 21, 2016, due to his responsibilities in connection with a jury trial scheduled to commence in U.S. District Court on November 28, 2016 and continue for three to four weeks thereafter, which have been specifically set aside for trial by the district court.

Further, Respondent's counsel William Dritsas will be out of state in Chicago, Illinois and unavailable from January 3 through 30, 2017 due to a long-standing, preexisting commitment with his law firm's management committee, which also cannot be rescheduled. Respondent anticipates that the hearing for this matter conservatively is very likely to exceed one week. Therefore, the earliest Respondent's counsel is available to commence and conduct the hearing on consecutive dates is the week of February 6, 2017.

Moreover, Respondent anticipates that, given the large scope of allegations contained in the Consolidated Complaint, the parties will require additional time prior to hearing in order to issue and respond to subpoena requests, and to prepare and respond to any petitions relating thereto, negotiate factual stipulations in an effort to shorten the length of the hearing, as well as to explore whether resolution of any allegations is possible.

Respondent contacted Counsel for the General Counsel, who does not object to a hearing continuance, but has proposed the alternative dates of December 19, 2016 or January 9, 2017 for rescheduling the hearing. Respondent also contacted counsel for the Charging Party, who states that the Charging Party objects to continuing the hearing to February 6, 2017 based on undue delay, and instead supports Counsel for the General Counsel's views on the appropriate dates for a continuance, if one is granted.

This is Respondent's first request for a continuance, and Respondent submits that rescheduling the hearing will not cause any hardship or undue delay of the proceedings.

Accordingly, Respondent respectfully requests that the hearing in this matter be rescheduled to the week of February 6, 2017. Alternatively, if the hearing cannot be moved to the week of February 6, 2017, Respondent respectfully requests that the hearing be rescheduled

for the week of January 9, 2017, or to such other date thereafter as may be determined by the Regional Director in consultation with the parties.

Submitted this 17<sup>th</sup> day of October, 2016.

Respectfully submitted,

**TRUMP RUFFIN COMMERCIAL, LLC**

By its attorneys,

*/s/ Matthew J. Cute*

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Matthew J. Cute

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**CERTIFICATE OF SERVICE**

I do hereby certify that I caused a true and correct copy of the foregoing **RESPONDENT TRUMP RUFFIN COMMERCIAL, LLC'S MOTION TO RESCHEDULE HEARING** to be served upon the following individuals, via the National Labor Relations Board's e-filing system and email on this 17th day of October, 2016:

Cornele A. Overstreet, Regional Director  
(via E-Filing)  
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By: /s/ Matthew J. Cute  
Attorney for Respondent