

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF NEW YORK**

**RHONDA P. LEY, Regional Director of the
Third Region of the National Labor Relations Board,
for and on behalf of the
NATIONAL LABOR RELATIONS BOARD**

Petitioner

v.

CIVIL NO.
1:16-cv-1279 (FJS/DJS)

ASGS MANAGEMENT CORP.

Respondent

**PETITIONER'S MOTION TO SHORTEN TIME AND
FOR AN EXPEDITED HEARING**

Petitioner, Rhonda P. Ley, Regional Director of the Third Region of the National Labor Relations Board, for and on behalf of the National Labor Relations Board, pursuant to Fed. R. Civ. P. 6(d) and Local Rule 7.1(d), by the undersigned counsel, hereby moves the Court for an Order, fixing a date and time for an expedited hearing on the petition for injunctive relief in this matter. Petitioner urges the Court that the action herein for injunctive relief under Section 10(j) of the National Labor Relations Act is a matter designated under 28 U.S.C. Sec. 1657(a) as warranting expedited treatment. Petitioner further urges the Court that the granting of such an order is a prerequisite for the Court to assume jurisdiction of this matter. Points and authorities in support of this motion are set forth in the accompanying memorandum. This motion is also supported by the October __, 2016 declaration of Rhonda P. Ley, Regional Director of the Third Region of the National Labor Relations Board.

Respectfully submitted this 26th day of October, 2016.

/s/ Jessica L. Noto
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