

**UNITED STATES OF AMERICA
BEFORE THE NATIONAL LABOR RELATIONS BOARD
REGION 14**

DFW SECURITY PROTECTION FORCE,

and

**Cases 14-CA-180205 and
14-CA-183543**

**UNITED GUARDS OF AMERICA, LOCAL
100**

MOTION TO RESCHEDULE HEARING

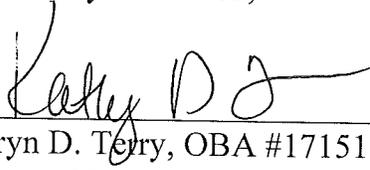
COMES NOW, the Employer and Respondent in the above-captioned matter, DFW Security Protection Force (“Employer”), and pursuant to Section 102.24, Rules and Regulations, respectfully moves to reschedule the hearing in the above-captioned matter.

In support hereof, Employer states as follows:

1. This matter is currently set for hearing on Tuesday, May 23, 2017 at 9 a.m., in Oklahoma City, Oklahoma.
2. Employer had been defending itself in earnest, and without the assistance of counsel. At a telephone hearing on or about May 1, 2017, the administrative judge assigned, Judge Dibble, encouraged Employer to seek counsel.
3. On May 16, 2017 at approximately 3 p.m., CST, Employer retained the undersigned in this matter. The undersigned immediately contacted Mr. Fink, Counsel for the General Counsel, and Mr. Jarrod Leaman, Counsel for the Charging Party, United Guards of America, Local 100.

4. Both the General Counsel and the Charging Party object to this request to reschedule the hearing.
5. Employer understands the frustrations associated with a delay in the hearing but given the many issues and disputes in this matter, Employer respectfully requests the hearing be rescheduled to afford Employer's newly retained counsel and Employer adequate time to prepare and present its defenses. At this time, the undersigned is gathering documents produced to date, reviewing the filings of the parties in an effort to prepare in earnest and to respond to a subpoena received by Employer yesterday from the General Counsel's office. Employer believes the requested rescheduling will result in a more orderly and productive hearing.
6. Counsel for the General Counsel has relayed that the earliest currently available hearing date for a single day hearing date with the Division of Judges is July 31, 2017 and that date is also acceptable to Employer, the General Counsel and the Charging Party. The parties anticipate the hearing can be completed in a single day.
7. The undersigned certifies and affirms that simultaneously with the filing of this request, a copy of same is being emailed to Counsel for the General Counsel and Counsel for the Charging Party.

Respectfully submitted,



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CERTIFICATE AND AFFIDAVIT OF SERVICE

I hereby certify that on the 17th day of May, 2017, I caused to be emailed a true and correct copy of the above and foregoing instrument simultaneously with its filing to the following parties:

Jarrold Leaman
Counsel for the Charging Party, United
Guard Workers of American, Local 100
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