

UNITED STATES OF AMERICA
BEFORE THE NATIONAL LABOR RELATIONS BOARD
REGION 18

RICHFIELD HOSPITALITY, INC.,
AS MANAGING AGENT FOR KAHLER
HOTELS, LLC

Case No.: 18-CA-198527

and

UNITE HERE INTERNATIONAL UNION,
LOCAL 21

RESPONDENT'S MOTION TO CONTINUE HEARING

A hearing in this case is currently scheduled for September 26, 2017. For the reasons shown below, Respondent hereby requests that the hearing be postponed until November 15, 2017.

1. Since December 2016, Respondent has been scheduled to participate in a college recruiting conference in Wisconsin on September 26 and 27, 2017. Two of Respondent's employees who are also necessary witnesses in the hearing – Mary Kay Costello and Chad Decker, Respondent's Co-Human Resources Directors – are committed to attending. This conference is traditionally important to Respondent for recruiting interns and December graduates.
2. In late September/early October, St. Paul's local Workforce center will be putting on a Customer Service Job Fair that Respondent also traditionally relies on for hiring.
3. From October 8 through October 11, 2017, Ms. Costello and Mr. Decker are scheduled to attend a Human Resources conference in Minnesota.
4. From October 15 to approximately October 22, 2017, Mr. Decker will be traveling in the Philippines on a recruiting trip.

5. On October 20, 24 and 25, 2017, Ms. Costello's presence will be required on additional recruiting trips in Iowa and South Dakota.
6. These job fairs, recruiting trips and Human Resources conferences are important to the Respondent's ability to staff its facilities. No other employees within the company are appropriately qualified to attend them. However, Ms. Costello and Mr. Decker are also important witnesses with respect to the matters to be tried at the hearing in this case. Ms. Costello has knowledge of and will be testifying about some of the circumstances alleged in Complaint No. 187974, and Mr. Decker has knowledge of and will be testifying about some of the circumstances alleged in Complaint No. 198527.
7. Respondent respectfully requests that the Board postpone the hearing currently scheduled for September 26 until November 15, 2017, to allow Ms. Costello and Mr. Decker to attend the hearing, because both are expected to be witnesses for the Respondent. Moreover, it is not clear how long the hearing will take.
8. Respondent has contacted the counsel for the General Counsel about this request, but the CGC does not consent to the Respondent's request.

WHEREFORE, Respondent respectfully requests that the hearing currently scheduled for September 26, 2017, be postponed until November 15, 2017.

Dated: This 4th day of August, 2017.

STOKES WAGNER

By: /s/ Arch Y. Stokes
Arch Y. Stokes
1201 W. Peachtree Street
Suite 2400
Atlanta, Georgia 30309
Telephone: (404) 766-0076
Facsimile: (404) 766-8823
astokes@stokeswagner.com

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Motion to Continue Hearing was electronically filed with Region 18 and counsel for petitioner below:

Jennifer A. Hadsall
Acting Regional Director
National Labor Relations Board
Region 18
Federal Office Building
212 3rd Avenue South, Suite 200
Minneapolis, MN 55401
jennifer.hadsall@nlrb.gov

Martin Goff
312 Central Ave SE
Suite 444
Minneapolis, MN 55414
mgoff@here17.org

Tyler Wiese
Chinyere Ohaeri
National Labor Relations Board
Region 18
Federal Office Building
212 3rd Avenue South, Suite 200
Minneapolis, MN 55401
tyler.wiese@nlrb.gov
chinyere.ohaeri@nlrb.gov

Dated: August 4, 2017.

/s/ Arch Y. Stokes
Arch Y. Stokes