

# BakerHostetler

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February 9, 2018

### VIA E-FILING

Paul J. Murphy  
Acting Regional Director  
National Labor Relations Board, Region 01  
10 Causeway Street, 6th Floor  
Boston, MA 02222

*Re: Case No. 01-CA-205559, Request to Postpone Hearing*

Dear Mr. Murphy:

Pursuant to 29 CFR 102.16(a), Respondent Wyndham Hotel Management, Inc. on behalf of Wyndham Boston Beacon Hill Hotel (“Respondent” or the “Hotel”) respectfully requests that the hearing scheduled in this matter be postponed from April 11, 2018, to April 17, 2018, or any date thereafter at the Region’s convenience.

Good and sufficient grounds exist for the Region to grant this request because from April 9-13 Tom Chmura, General Manager of the Hotel, and Kathy Lucas, the Hotel’s Human Resources Director, will be attending a mandatory out of town annual company-wide conference that was scheduled a year in advance. Both Mr. Chmura and Ms. Lucas are integral witnesses with institutional knowledge of the Hotel and percipient knowledge of the events at issue in this case. Their absence for any portion of the hearing will prejudice the Hotel.

On the morning of February 7, 2018, we contacted Counsel for the Charging Party, who is copied on this correspondence, to obtain Charging Party’s position regarding this extension request. As of the time that this letter is submitted, Mr. More has not responded to our request.

Thank you for your consideration in this matter.

Sincerely,

  
Paul Rosenberg

cc: Paul L. More, Esq (via e-mail).

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Houston Los Angeles New York Orlando Philadelphia Seattle Washington, DC