

**UNITED STATE OF AMERICA
NATIONAL LABOR RELATIONS BOARD
Region 14**

TAYLOR ROOFING SOLUTIONS, INC.)	
AND CAPITOL ROOFING SOLUTIONS, LLC)	
)	
Respondent,)	
)	
and)	Case No. 14-CA-211073
)	
UNITED UNION OF ROOFERS,)	
WATERPROOFERS, AND ALLIED)	
WORKERS, LOCAL UNION NO. 2, AFL-CIO)	
)	
Charging Party.)	

EMPLOYER’S MOTION FOR POSTPONEMENT

TAYLOR ROOFING SOLUTIONS, INC. AND CAPITOL ROOFING SOLUTIONS, LLC (collectively “Respondents”) move the Regional Director to postpone the hearing in this matter currently scheduled for September 17, 2018 and consecutive days as needed. In support of its request, the Employer, states as follows, namely:

1. The undersigned co-representative, Cynthia Sauter (“Ms. Sauter”) will be out of the country from September 9, 2018 until late in the evening September 23, 2018.
2. Ms. Sauter’s trip has been scheduled for several months, has been paid for in full, and cannot be cancelled or rescheduled without great financial penalty. Ms. Sauter provides the confirmation page for her trip as validation and attached to this motion as Exhibit 1.
3. The undersigned co-representative James Allen (“Mr. Allen”) will be in Tampa, Florida October 8 – 19, 2018 for witness preparation and trial in Region 12 case number 12-CA-209809 and case number 12-CA-211099.
4. The complexity of the issue being litigated in the instant case, and principles of due process and equity, compels allowance for the attendance of both Respondent’s representatives for hearing.
5. In deference to the need for as much notice as possible in these matters, this filing has been made at the earliest possible time.

6. Mr. Allen has reached out to union counsel, Matthew Gierse (“Mr. Gierse”) concerning the union’s position on postponement. Mr. Gierse indicated that postponement is not opposed by the union but only if the postponed hearing begins the week of October 29, 2018. The union opposes all other dates as an alternate start time.
7. In an effort to avoid delay, Mr. Allen and Ms. Sauter offer the week of October 1, 2018 as an alternative date, although the union has indicated it opposes this date. Should that week not be available, Mr. Allen and Ms. Sauter offer October 22, 2018 or any week following including but not limited to the week of October 29, 2018 which the union has indicated is the only week acceptable to them in a postponement.
8. The undersigned is not seeking excessive delay.
9. The undersigned does not seek delay for an unreasonable cause.
10. Any delay is not intended to be prejudicial.
11. All parties have been served with this motion.

WHEREFORE, TAYLOR ROOFING SOLUTIONS, INC. AND CAPITOL ROOFING SOLUTIONS, LLC pray the Regional Director postpone the hearing currently scheduled for Monday, September 17, 2018, in St. Louis, Missouri; and such other relief as the Regional Director finds appropriate.

Respectfully submitted:

/s/ James Allen
James Allen
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Representative for TRS, Inc. & CRS, LLC

/s/ Cynthia Sauter
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Representative for TRS, Inc. & CRS, LLC

CERTIFICATE OF SERVICE

This is to certify that service of the above and foregoing EMPLOYER’S MOTION FOR POSTPONEMENT has been made on Region 14 of the National Labor Relations Board on June 11, 2018 via the Agency’s e-filing portal, and courtesy copies have been electronically served on the following parties, namely:

Patrick H. Myers, Esq.
Field Attorney
Region 14
1222 Spruce Street, Room 8.302
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Patrick.Myers@nlrb.gov

Matthew Gierse, Esq.
Hartnett Gladney Hetterman, LLC
4399 Laclede Ave.
St. Louis, Missouri 63108
MGierse@hghllc.net

/s/ James Allen
James Allen
Burdzinski & Partners

/s/ Cynthia Sauter
Cynthia Sauter
Burdzinski & Partners



Booking Confirmation - Guest Copy

Issue Date: 10 JUN 2018
Confirmation Copy #: 24

General Information

	Reservation ID:	796832 (Group ID Not Applicable)	Booking Date:	03 FEB 2018
	Ship:	CELEBRITY SILHOUETTE	Booking Status:	Booked
	Departure Date:	25 AUG 2018		
	Itinerary:	14 NIGHT WESTERN MEDITERRANEAN CRUISE		
	Stateroom:			
	Sailing Date:	09 SEP 2018		

Guest Information

	Guest #1	Guest #2	Guest #3	Guest #4
Guest Name	BERNARD BURDZINSKI	CYNTHIA SAUTER		
Captain's Club Number				
Age Range				
Dining	8:45 PM()	8:45 PM()		
Departure Airport	DAYTON(DAY)	DAYTON(DAY)		
Special Services				
Stateroom Dining With Booking ID:				

Booking Charges - Currency: USD

	Guest #1	Guest #2	Guest #3	Guest #4	Total
Cruise Fare					
Pre Cruise Package					
Post Cruise Transfer					
Vacation Protection Plan(Declined)					
Gratuities					
YEG9-PROMO2C					
YEH1-BEVCLINGRAT					
YKI7-SAVINGS					
YQG5-GRAT C/A 14N					
ChoiceAir Charges					
Taxes, fees, and port expenses					
Total Charge					
Amount Paid					
Balance Due					0.00

Deposit has been posted to your reservation. Final Payment is due by 11 JUN 2018, 5:00 PM EST

The balance due must be paid in full by the final payment date listed above to prevent your booking from cancelling. Balance and payments may not reflect recent transactions made within the past 48 hours.

The CruiseCare Vacation Protection Plan is not in effect until the plan cost has been received by Celebrity Cruises in addition to any cruise deposits due. Deposit amounts may vary by promotion. North American bookings will require a 200% deposit of standard deposit amount for deluxe suite categories. This amount is not reflected in the total deposit requirement listed above.

Cancellation Schedule

Cancellation Schedule	Cancellation Amount	Date
89 to 57 Days Prior to Sailing	450.00 Deposit Amount Per Guest	12 JUN 2018
56 to 29 Days Prior to Sailing	50% Per Guest	15 JUL 2018
28 to 15 Days Prior to Sailing	75% Per Guest	12 AUG 2018
14 to 0 Days Prior to Sailing	100% Per Guest	26 AUG 2018

Promotions Applied

GOBETTER BEVGRT
SAILBEYOND SAVE

Please be advised if your booking qualifies for any amenity these will be applied within 10 business days.

General Information

Reservation ID:	796832 (Group ID Not Applicable)	Booking Date:	03 FEB 2018
Ship:	CELEBRITY SILHOUETTE	Booking Status:	Booked
Departure Date:	25 AUG 2018		
Itinerary:	14 NIGHT WESTERN MEDITERRANEAN CRUISE		
Stateroom:	[REDACTED]		
Sailing Date:	09 SEP 2018		

Booking Itinerary

Pre Cruise Arrangements

08 SEP	TRANSFER, AIRPORT TO HOTEL		
08 SEP	HOLIDAY INN KENSINGTON FO	3:00 PM	
09 SEP	HOLIDAY INN KENSINGTON FO		11:00 AM
09 SEP	TRANSFER, HOTEL TO PIER		

Cruise Itinerary - Check-in Between: 10:30 AM - 2:30 PM (Embarkation time, itinerary, hotel, rail and/or transportation may change without notice as conditions warrant)

Date	Port Location	Arrive	Depart	Date	Port Location	Arrive	Depart
09 SEP	SOUTHAMPTON, ENGLAND		4:00 PM	16 SEP	ROME (CIVITAVECCHIA), ITALY	7:00 AM	7:00 PM
10 SEP	AT SEA			17 SEP	AJACCIO, CORSICA	7:00 AM	3:00 PM
11 SEP	AT SEA			18 SEP	BARCELONA, SPAIN	8:00 AM	5:00 PM
12 SEP	GIBRALTAR, UNITED KINGDOM	2:00 PM	7:00 PM	19 SEP	AT SEA		
13 SEP	AT SEA			20 SEP	LISBON, PORTUGAL	1:00 PM	9:00 PM
14 SEP	PROVENCE (TOULON), FRANCE	10:00 AM	7:00 PM	21 SEP	AT SEA		
15 SEP	FLORENCE/PISA(LIVORNO),ITALY	7:00 AM	7:00 PM	22 SEP	AT SEA		
				23 SEP	SOUTHAMPTON, ENGLAND	6:00 AM	

Post Cruise Arrangements

--- Transfer from Pier

Zika Virus Update

The CDC has issued a travel alert regarding the Zika virus for certain countries, which may be included in your cruise itinerary. To learn more about the Zika virus, please visit the CDC's website. For travel-related concerns, please visit <http://www.celebritycruises.com/frequently-asked-questions#faq5992> or contact us or your travel agent.

Important Information



- Please take a few minutes to familiarize yourself with the required travel documents you will be asked to provide prior to boarding the ship. It is the guest's responsibility to obtain all valid travel documents for their vacation. Please review the Vital Information page that follows.
- Protect your investment by securing our Vacation Protection Plan. Cruise Care provides coverage for trip interruption, accident and sickness medical benefits, evacuation, baggage protection and much more. For detailed information on our 'Vacation Protection Plan', please visit www.celebritycruises.com/CruiseCare.
- The CruiseCare Vacation Protection Plan is not in effect until the plan cost has been received by Celebrity Cruises in addition to any cruise deposits due.
- Due to new government regulations, Guests must be checked-in and onboard no later than 90 minutes prior to the sailing time or they will not be permitted to sail. To expedite boarding, check-in online at www.celebritycruises.com/onlinecheckin. This is available 24 hours after final payment has been made and up to three (3) days prior to sailing, not including the day of sailing.