

**UNITED STATES
NATIONAL LABOR RELATIONS BOARD
REGION 7**

Walton Woods-Cherry Hill

Case No. 07-CA-224161

Employer,

AND

SEIU Healthcare Michigan

Petitioner.

SEIU HEALTHCARE MICHIGAN

Kimberly Fowlkes-Organizer
3031 West Grand Blvd
Suite 555
Detroit, MI 48202

**FOSTER SWIFT COLLINS AND
SMITH**

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WALTON WOODS-CHERRY HILL MOTION TO RESCHEDULE HEARING

Walton Woods-Cherry Hill, through its attorneys, Foster, Swift, Collins, & Smith, P.C., files its Motion to Reschedule the Hearing, and in support states as follows:

1. By letter dated July 32, 2018, the Employer received the Board's notice of the Union's petition for an election.
2. The Board set the date for a representation hearing for Tuesday, July 31, 2018.
3. The Employer and the Union have been working diligently to reach a stipulated election agreement and it appears that an agreement will be executed as all substantive issues for the unit description, election location, dates, and times have been agreed upon by the parties.
4. However, in the unlikely event an election agreement is not agreed upon, the Employer's representative is not available due to being out of state in Delaware on that day and the following day, August 1, 2018.
5. The undersigned will return and be available for hearing two days later on August 1, 2018.
6. The Board's rules and regulations permit the postponement of the a hearing for two days as requested in this motion.
7. The undersigned's attorney has detailed knowledge of the facts of the issues presented at hearing and has had good faith discussions with the union on the matters at issue that could lead to the resolution of the issues at hearing. His presence is required and/or necessary at the hearing.
8. The undersigned has discussed this request with the union's representative on July 24, 2018 and the union agreed to the request.
9. Wherefore, the Respondent respectfully requests an adjournment of the hearing in this Consolidated Complaint from July 31, 2018 to August 1, 2018.

Respectfully Submitted,

Foster, Swift, Collings, & Smith, P.C.

By: /s/Clifford L. Hammond
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Dated: July 25, 2018

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on July 25, 2018, copies of the Employer's MOTION TO RESCHEDULE THE HEARING and this Certificate of Service were filed by the undersigned using the NLRB's E-Filing System and upon the Union at kim.fowlkes@seiuhcmi.org.

/s/Clifford L Hammond
Clifford L. Hammond

Date: July 25, 2018