

UNITED STATES OF AMERICA
BEFORE THE NATIONAL LABOR RELATIONS BOARD
REGION 12

20/20 COMMUNICATIONS, INC.,

CASE NO. 12-CA-165320

and

CHARLES SMITH, an Individual,

RESPONDENT'S SECOND REQUEST FOR AN EXTENSION OF TIME TO FILE
SHOW CAUSE RESPONSE ON REMAND

Comes now 20/20 COMMUNICATIONS, INC. (hereinafter "Respondent"), by its attorneys and, pursuant to § 102.46 of the National Labor Relations Board's Rules and Regulations requests an extension to file Respondent's Show Cause Response on Remand from December 21, 2018, to and including January 4, 2019 and, in support thereof, states as follows:

1. On September 6, 2016, the above-entitled matter was transferred to the NLRB pursuant to Section 102.45.
2. This matter was submitted to Administrative Law Judge Michael A. Rosas ("ALJ Laws") on a stipulated record.
3. Respondent requires additional time because lead counsel Kevin Zwetsch is on a reduced work hour medical leave until December 31, 2018, and recovering from a minor injury. Respondent's counsel should have sought a longer extension to begin with, and apologizes to the agency, charging party, and his counsel, for not doing so.

4. The requested extension is for good cause, and is needed for Respondent's counsel to address his medical needs. There will be no prejudice to any party if the extension is granted.

5. Counsel for Respondent has contacted Counsel for the General Counsel and outlined Respondent's intention to seek an extension to January 4, 2019 to file Respondent's Show Cause Response on Remand. Counsel for the General Counsel, Caroline Leonard, responded that the Region has no objection to this request for a 2-week extension.

6. Counsel for Respondent has also contacted Charging Party's counsel, Andrew Frisch, regarding Respondent's intention to seek an extension to January 4, 2019 to file Respondent's Show Cause Response on Remand. Counsel for Charging Party responded that Charging Party has no objection to this request for extension.

7. Given both Counsel for Charging Party and Counsel for the General Counsel lack any objection to this reasonable request, Respondent respectfully requests an extension of time to January 4, 2019 for the purpose of filing Respondent's Show Cause Response on Remand.

DATED: December 21, 2018

Respectfully submitted,

s/Kevin D. Zwetsch

Kevin D. Zwetsch

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Attorneys for Respondent

STATEMENT OF SERVICE

The undersigned certifies that on December 21, 2018, a copy of the foregoing RESPONDENT'S SECOND REQUEST FOR AN EXTENSION OF TIME TO FILE SHOW CAUSE RESPONSE ON REMAND has been filed via electronic filing with:

Executive Secretary
National Labor Relations Board
1099 14th Street N.W.
Washington, DC 20570
Served via Filing Electronically on NLRB.gov.

and served via e-mail upon:

David Cohen, Regional Director
National Labor Relations Board, Region 12
201 East Kennedy Blvd., Suite 530
Tampa, Florida 33602-5824
Served via electronic mail at David.Cohen@nlrb.gov

John W. Plympton
Served via electronic mail at John.Plympton@nlrb.gov.

Caroline Leonard
Served via electronic mail at caroline.leonard@nlrb.gov.

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/s/Kevin D. Zwetsch
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