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May 23, 2019

**Via E-File**

Roxanne L. Rothschild  
Executive Secretary  
National Labor Relations Board  
1015 Half Street SE  
Washington, D.C. 20570-0001

**Re: Twin America LLC, et al.,**  
**Case Nos. 02-CA-190704, et al.**

Dear Executive Secretary Rothschild:

This firm represents Twin America, LLC, City Sights NY, LLC, Gray Line New York Tours, Inc., and JAD Transportation, Inc. (“Respondent Employers”) in the above-referenced matter. The General Counsel (“GC”) timely filed Exceptions to the Administrative Law Judge’s Decision (“ALJD”) and Brief in Support of Exceptions on May 17, 2019.<sup>1</sup> Gary Rothman, Esq., and Eric J. LaRuffa, Esq., of Rothman Rocco LaRuffa LLP represent the United Service Workers Union, Local 1212 (“Respondent Union”) in this matter. Answering Briefs to the GC’s Exceptions and Brief in Support must be filed with the Board by May 30, 2019. Due to the reasons set forth below, Respondent Employers and Respondent Union respectfully file this thirty (30) day joint extension of time request for filing Answering Briefs in the above-

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<sup>1</sup> On April 10, 2019, Counsel for the GC E-filed a thirty (30) day extension of time request for the filing of exceptions and supporting brief. The Executive Secretary’s Office granted this extension request on the same day, extending the deadline for submission of exceptions from April 17, 2019 to May 17, 2019.

A Pennsylvania Limited Liability Partnership

California Colorado Delaware District of Columbia Florida Georgia Illinois Minnesota  
Nevada **New Jersey** New York North Carolina Pennsylvania South Carolina Texas Washington



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referenced matter. If granted, the new deadline for submitting Answering Briefs would be July 1, 2019.<sup>2</sup>

Counsel for Respondent Employers are unavailable over the next two weeks dealing with multiple filings in federal district court and traveling out-of-state on pre-scheduled work matters. Additionally, client representatives who need to review and approve of Respondent Employers' Answering Brief before filing are also traveling due to the upcoming Memorial Day holiday and will be doing so thereafter on business matters. Similarly concerned, counsel for Respondent Union have an unrelated scheduled R-case hearing during the time in which Answering Briefs are currently due, multiple filings in separate cases, and a pre-arranged family vacation.

The GC does not and will not oppose Respondents' joint request for a thirty (30) day extension of time for filing Answering Briefs in this matter. Counsel for Respondent Employers have made repeated communication attempts – multiple calls to listed office and cell phone numbers, as well as several emails – to Arthur Z. Schwartz, Esq., a charging party and representative for charging parties in this matter, to obtain his position in his dual capacity on Respondents' joint request. To date, Mr. Schwartz has yet to advise whether he consents, does not oppose, or opposes Respondents' joint extension of time request.

Given these circumstances, Respondents respectfully and jointly request a thirty (30) day extension of time to file Answering Briefs in this case as such time is necessary to adequately represent their positions in response to the GC's exceptions and supporting brief to the ALJD.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read 'Carlos A. Torrejon'.

Carlos A. Torrejon  
Stanley L. Goodman  
Counsel for Respondent Employers

cc:

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<sup>2</sup> Although thirty (30) days from May 30, 2019 is actually June 29, 2019, this date lands on a Saturday. Thus, pursuant to the NLRB Rules and Regulations, Part Two, Section 102.2(a), the requested extension of time would run until the next Agency business day, which would be Monday, July 1, 2019.



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**CERTIFICATE OF SERVICE**

In accordance with the Board's Rules and Regulations, it is hereby certified that on this day Respondents' Joint Extension of Time Request for Filing Answering Briefs in Twin America, LLC, et al., Case Nos. 02-CA-190704, et al., was electronically filed with the Executive Secretary's Office. It is further certified that on this day the same document was served via email on the following party representatives:

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Dated: May 23, 2019



Carlos A. Torrejon