

UNITED STATES OF AMERICA
BEFORE THE NATIONAL LABOR RELATIONS BOARD
REGION 9

NOLAN ENTERPRISES, INC. D/B/A
CENTERFOLD CLUB

and

Case 09-CA-220677

BRANDI CAMPBELL, AN INDIVIDUAL

**COUNSEL FOR THE GENERAL COUNSEL'S MOTION
FOR AN EXTENSION OF TIME TO FILE CROSS-EXCEPTIONS AND
A REPLY BRIEF TO RESPONDENT'S EXCEPTIONS TO THE
ADMINISTRATIVE LAW JUDGE'S DECISION**

This Motion respectfully requests an extension of time to file Exceptions in the above-captioned matter.

On July 25, 2019, Administrative Law Judge Andrew S. Gollin issued a decision finding that Respondent unlawfully discharged employee Brandi Campbell in violation of Section 8(a)(1) and (4) of the Act. On August 20, 2019, Respondent filed exceptions to the Administrative Law Judge's decision.

Pursuant to Section 102.46(b) and (c) of the National Labor Relations Board's Rules and Regulations, the undersigned respectfully requests an extension of time for the General Counsel to file cross-exceptions and an answering brief in this matter. Counsel for the General Counsel, Zuzana Murarova, who represented the General Counsel in the underlying, has been out of the office and unavailable from August 16, 2019 through September 3, 2019. She will further be out of the office and unavailable from September 9, 2019 through September 12, 2019. As the sole litigant on behalf of the General Counsel, Ms. Murarova is intimately involved in the underlying litigation, and consequently is the only attorney who can critically analyze Judge Gollin's decision and Respondent's exceptions thereto, and to prepare an answering brief and cross-

exceptions in this matter. Accordingly, in order for the General Counsel to adequately prepare and submit an answering brief to Respondent's exceptions and cross-exceptions which comport with the Board's Rules and Regulations, it is respectfully submitted that an extension of time is necessary.

The undersigned respectfully requests that the Board grant an extension to September 19, 2019 for a reply brief and cross-exceptions to be filed in this matter.

Dated: September 5, 2019

Respectfully submitted,

/s/ Zuzana Murarova

Zuzana Murarova
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CERTIFICATE OF SERVICE

September 5, 2019

I hereby certify that I served Counsel for the General Counsel's Motion for an Extension of Time to File Cross-Exceptions and a Reply Brief to Respondent's Exceptions to the Administrative Law Judge's Decision on this date on the following parties by electronic mail.

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Respectfully submitted,

/s/ Zuzana Murarova

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