

**BEFORE THE  
NATIONAL LABOR RELATIONS BOARD  
REGION 32**

International Association of Machinists and	)	
Aerospace Workers, District Lodge 725,	)	
	)	
Petitioner	)	
	)	NLRB Case No. 32-RC-247696
and	)	
	)	
International Paper Company, Inc.	)	
	)	
<u>Respondent</u>	)	

**MOTION TO MOVE HEARING DATE**

Respondent, International Paper Company, Inc., (“Respondent”), respectfully moves for an order moving the hearing date and the date for Respondent’s position statement for the above-referenced matter. In support of this Motion, Respondent states as follows:

1. The petition for the above-referenced matter was filed on Thursday, September 5, 2019.
2. Due to an error in email addresses provided to the Region, Respondent did not receive notification of the petition until Friday, September 6, 2019. Respondent’s counsel for this matter promptly entered an appearance on September 6.
3. In email communication with the agent assigned by the Region (Nicholas Tsiliacos), Mr. Tsiliacos informed Respondent’s counsel that the hearing for this matter was scheduled for Monday, September 16 and this was confirmed by the Notice of Hearing received by Respondent’s counsel today.
4. On September 16, Respondent’s counsel is scheduled to be in Queens, New York, for an initial bargaining session with Local 210 of the International Brotherhood of Teamsters for negotiations over a successor collective bargaining agreement. This bargaining session has been scheduled for several months, and will include Local 210’s bargaining committee, their counsel,

the Company's bargaining committee and the undersigned, and cannot be moved or postponed. The bargaining session is expected to last one day.

5. The undersigned counsel has represented Respondent in representation cases before the NLRB for many years, and is intimately familiar with the unit issues that may arise in the event the parties are unable to reach an election agreement.

6. Due to this unavoidable conflict, Respondent respectfully submits that special circumstances exist, and requests that the Regional Director move the hearing date for this matter by two business day until Wednesday, September 18. This additional time will permit Respondent's counsel to travel from New York to Oakland, meet with any witnesses that may be necessary and otherwise prepare for the hearing. Respondent further requests that the Regional Director also move the deadline for submission of any position statement necessary by two business days to Monday, September 16 (noon Pacific time).

7. Pursuant to Rule 102.63 of the Rules and Regulations of the National Labor Relations Board, Respondent requests that the Regional Director issue an order moving the hearing date from Monday, September 16 to Wednesday, September 18 and the deadline for the position statement until Monday, September 16.

8. Petitioner's counsel has been contacted concerning this request and is authorized to state that Petitioner does not oppose this request.

This 10th day of September, 2019.

Respectfully submitted,

/s/ Mark L. Keenan

Mark L. Keenan

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Respondent )	
_____ )	

**CERTIFICATE OF SERVICE**

I hereby certify that the foregoing Respondent’s Motion to Move Hearing Date was electronically filed and was on this date served upon the parties of record via email as follows:

Caroline Cohen  
Weinberg Roger & Rosenfeld  
1001 Marina Village Pkwy.  
Suite 2000  
Alameda, CA 94501-6430

This 10th day of September, 2019.

/s/ Mark L. Keenan  
Mark L. Keenan, Esq.