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Attorneys for Charging Party/Petitioner International Alliance of  
Theatrical Stage Employees and Moving Picture Technicians,  
Artists and Allied Crafts of the United States and Canada, Local  
720

UNITED STATES OF AMERICA  
NATIONAL LABOR RELATIONS BOARD

David Saxe Productions & V Theater Group,  
  
Employer/Respondent,  
  
and

International Alliance of Theatrical Stage  
Employees and Moving Picture Technicians,  
Artists and Allied Crafts of the United States  
and Canada, Local 720,

Charging  
Party/Petitioner.

No. 28-CA-219225, 28-RC-219130, et al.

**CHARGING PARTY'S OBJECTIONS  
TO EMPLOYER'S REQUEST FOR AN  
EXTENSION OF TIME TO FILE  
ANSWERING BRIEF TO THE UNION  
AND COUNSEL FOR THE GENERAL  
COUNSEL'S CROSS EXCEPTIONS**

International Alliance of Theatrical Stage Employees and Moving Picture Technicians,  
Artists and Allied Crafts of the United States and Canada, Local 720 (“Charging  
Party/Petitioner”) vigorously objects to David Saxe Productions & V Theater Group’s  
 (“Respondent”) request for an extension of time to file an answering brief to the General Counsel

and the Charging Party/Petitioner's cross exceptions. On November 4, 2019, the Respondent requested the Charging Party's position on an extension of 10 days to file its answering brief due to workload and the volume of the record. The issues raised in the Charging Party and General Counsel's cross exceptions are very narrow and limited, in contrast to Respondent's 173 exceptions and 75-page brief. The General Counsel submitted only four cross exceptions and the Charging Party/Petitioner submitted just seven. A two-week period to respond is more than sufficient to respond. Both the General Counsel and the Charging Party/Petitioner were able to file their answering briefs, cross exceptions, and briefs in support thereof, within two weeks and without any extension. The Respondent's extension request is unwarranted and underscores its continuing efforts to obstruct, delay, evade responsibility for its unfair labor practices and the terms ordered by the Administrative Law Judge. The Board should not permit the Respondent to cause unnecessary delay to these proceedings. For the reasons herein and the same reasons the Charging Party opposed the Respondent's prior extension request, the Charging Party strongly opposes this request. No extension of time should be granted.

Dated: November 6, 2019

WEINBERG, ROGER & ROSENFELD  
A Professional Corporation

By: /S/ CAROLINE N. COHEN  
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CERTIFICATE OF SERVICE

I am a citizen of the United States and resident of the State of California. I am employed in the County of Alameda, State of California, in the office of a member of the bar of this Court, at whose direction the service was made. I am over the age of eighteen years and not a party to the within action.

On November 6, 2019, I served the following documents in the manner described below:

**CHARGING PARTY’S OBJECTIONS TO EMPLOYER’S REQUEST FOR AN EXTENSION OF TIME TO FILE EXCEPTIONS**

- (BY ELECTRONIC SERVICE) By electronically mailing a true and correct copy through Weinberg, Roger & Rosenfeld’s electronic mail system from lhull@unioncounsel.net to the email addresses set forth below.

On the following part(ies) in this action:

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Counsel for David Saxe Productions & V  
Theatre Group

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on November 6, 2019, at Alameda, California.

\_\_\_\_\_  
Lara Hull