

UNITED STATES OF AMERICA
BEFORE THE NATIONAL LABOR RELATIONS BOARD

MEDIC AMBULANCE SERVICE, INC.

and

UNITED EMERGENCY MEDICAL SERVICES
WORKERS, LOCAL 4911, AFSCME, AFL-CIO

Case 20-CA-193784

**MEDIC AMBULANCE SERVICE, INC.'S REQUEST FOR
EXTENSION OF TIME TO FILE EXCEPTIONS AND
BRIEF IN SUPPORT OF EXCEPTIONS**

Pursuant to Section 102.46 of the Board's Rules and Regulations, Respondent Medic Ambulance Service, Inc. ("Medic") respectfully moves for a thirty (30) day extension of time in which to file its Exceptions and a Brief in Support of its Exceptions to the Board ("Exceptions").

The original due date for Medic to file its Exceptions is November 22, 2019. However, good cause exists to grant a thirty (30) day extension because (1) counsel for Medic has significant other professional commitments during the next several weeks, and (2) some counsel also have pre-scheduled vacations during the same time period.

For these reasons, Medic respectfully requests that the Board grant Medic a thirty (30) day extension, until on or before December 22, 2019, in which to file its Exceptions.

Respectfully submitted,

Dated: November 12, 2019

Carothers, DiSante & Freudenberger LLP

By: _____



Nicole A. Legrottaglie
Attorneys for Respondent Medic Ambulance
Service, Inc.

PROOF OF SERVICE

STATE OF CALIFORNIA, COUNTY OF SACRAMENTO.

I, the undersigned, declare that I am employed in the aforesaid County, State of California. I am over the age of 18 and not a party to the within action. My business address is 900 University Avenue, Suite 200, Sacramento, CA 95825. On November 12, 2019, I served upon the interested party(ies) in this action the following document described as:

**MEDIC AMBULANCE SERVICE, INC.'S REQUEST FOR
EXTENSION OF TIME TO FILE EXCEPTIONS AND
BRIEF IN SUPPORT OF EXCEPTIONS**

By the following method:

- (E-mail)** Based on an agreement of the parties to accept service by electronic transmission, I caused the documents to be sent to the persons at the electronic notification addresses listed in the attached service list.

- (MAIL)** By placing such envelope(s) with postage thereon fully prepaid into Carothers DiSante & Freudenberger LLP's interoffice mail for collection and mailing pursuant to ordinary business practice. I am familiar with the office practice of Carothers DiSante & Freudenberger LLP for collecting and processing mail with the United States Postal Service, which practice is that when mail is deposited with the Carothers DiSante & Freudenberger LLP personnel responsible for depositing mail with the United States Postal Service, such mail is deposited that same day in a post box, mailbox, sub-post office, substation, mail chute, or other like facility regularly maintained by the United States Postal Service in Sacramento, California.

SERVICE LIST


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I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on November 12, 2019, at Sacramento, California.

Melissa Adams
(Type or print name)


(Signature)