

UNITED STATES OF AMERICA
BEFORE THE NATIONAL LABOR RELATIONS BOARD

AMPERSAND PUBLISHING, LLC
d/b/a SANTA BARBARA NEWS-PRESS

and

GRAPHIC COMMUNICATIONS CONFERENCE,
INTERNATIONAL BROTHERHOOD OF
TEAMSTERS

Cases 31-CA-028589
31-CA-028661
31-CA-028667
31-CA-028700
31-CA-028733
31-CA-028734
31-CA-028738
31-CA-028799
31-CA-028889
31-CA-028890
31-CA-028944
31-CA-029032
31-CA-029076
31-CA-029099
31-CA-029124

**RESPONDENT AMPERSAND PUBLISHING, LLC dba SANTA BARBARA NEWS-
PRESS' REQUEST FOR SHORT CONTINUANCE OF COMPLIANCE HEARING;
DECLARATION OF CHRISTOPHER FROST**

Respondent Ampersand Publishing, LLC (“Ampersand”) hereby requests a short continuance of the December 10 compliance hearing. Based on the call with the hearing officer last week, it appears that the General Counsel anticipates that the hearing will go several days. This is the first time we have learned of the anticipated length of the hearing. The undersigned counsel’s schedule involves numerous irremediable conflicts. More specifically, counsel has the following other obligations in advance of and during the time of the hearing:

Present thru December 2: arbitration preparation for final day of Marshall Geller v. St. Cloud Investments

December 3: hearing in Township Orlando v. Atlas (morning); closing arguments in

arbitration in Marshall Geller v. St. Cloud Investments (afternoon)

December 4: mediation in another matter for client Krav Precision

December 5: travel to New York for depositions and hearing.

December 6: person most knowledgeable deposition in Playboy v. XL Catlin

December 9: hearing in Borden v. TPG

December 10: travel from New York; opposition to demurrer due in iTruth v. Lunglife

December 12-13: depositions in Union Patriot v. Rionda Del Castro

In the meantime, the General Counsel has demanded a response to the amended compliance specification by December 6, and separately the NLRB is expecting a further production of documents by the first week of December.

Ampersand is only requesting a continuance of a few weeks, until early to mid January, or whenever thereafter is convenient for all parties. Given the fact that one of the General Counsel's witnesses is not available for in-person testimony during the currently-scheduled timeframe, there is no reason to force the hearing to go forward now rather than at a time when all parties and witnesses can be available.

For these reasons, Ampersand requests a short continuance of the hearing.

Dated: November 25, 2019

Respectfully Submitted,

By:  _____

Christopher Frost
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Beverly Hills, CA 90210
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Attorneys for Ampersand Publishing, LLC
d/b/a *Santa Barbara News-Press*

DECLARATION OF CHRISTOPHER FROST

I, Christopher Frost, hereby declare:

1. I am the head of litigation for Eisner, LLP, counsel of record for Ampersand Publishing, LLC (“Ampersand”). I have personal knowledge of the facts stated herein and, if called upon to do so, could and would testify competently thereto.

2. Ampersand is requesting a short continuance of the December 10 compliance hearing. Based on the call with the hearing officer last week, it appears that the General Counsel anticipates that the hearing will go several days. This is the first time we have learned of the anticipated length of the hearing. I have several conflicting obligations that cannot be moved and that create numerous irremediable conflicts. More specifically, I have the following other obligations in advance of and during the time of the hearing that inhibit my ability to prepare for and be present at the upcoming hearing:

Present thru December 2: arbitration preparation for final day of Marshall Geller v. St. Cloud Investments

December 3: hearing in Township Orlando v. Atlas (morning); closing arguments in arbitration in Marshall Geller v. St. Cloud Investments (afternoon)

December 4: mediation in another matter for client Krav Precision

December 5: travel to New York for depositions and hearing.

December 6: person most knowledgeable deposition in Playboy v. XL Catlin

December 9: hearing in Borden v. TPG

December 10: travel from New York; opposition to demurrer due in iTruth v. Lunglife

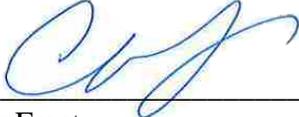
December 12-13: depositions in Union Patriot v. Rionda Del Castro

3. In the meantime, the General Counsel has demanded a response to the amended compliance specification by December 6, and separately the NLRB is expecting a further production of documents by the first week of December.

4. Ampersand is only requesting a continuance of a few weeks, until early to mid-January, or whenever thereafter is convenient for all parties. Given the fact that one of the General Counsel's witnesses is not available for in-person testimony during the currently-scheduled timeframe, there is no reason to force the hearing to go forward now rather than at a time when all parties and witnesses can be available.

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

Dated: November 25, 2019



Christopher Frost

CERTIFICATE OF SERVICE

I hereby certify that a copy of RESPONDENT AMPERSAND PUBLISHING, LLC dba SANTA BARBARA NEWS-PRESS' AMENDED RESPONSE TO THE COMPLIANCE SPECIFICATION was served by E-Mail and E-Filed, on the parties whose names and addresses are listed below.

By E-Filing:

The Honorable Gerald Etchingham
Associate Chief Administrative Law Judge
National Labor Relations Board
San Francisco Division of Judges
901 Market Street, Suite 485
San Francisco, CA 94013

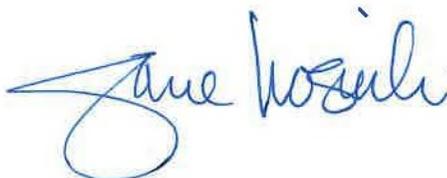
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Dated: November 25, 2019



Czarbelle Koscinski