

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

ABF FREIGHT SYSTEMS, INC.

and

Cases 09-CA-208379
09-CA-210267

GENERAL TRUCK DRIVERS, WAREHOUSEMEN,
HELPERS, SALES AND SERVICE, AND CASINO
EMPLOYEES AND INTERNATIONAL
BROTHERHOOD OF TEAMSTERS (IBT),
LOCAL 957

**GENERAL COUNSEL'S MOTION FOR AN EXTENSION
TO FILE A SUPPLEMENTAL BRIEF
PURSUANT TO THE BOARD'S INVITATION TO FILE BRIEFS**

The General Counsel, through the undersigned, hereby files this request for an extension of time to file supplemental briefs in response to the Board's October 31, 2019, invitation to file briefs in these cases.

Following Administrative Law Judge Keltner Locke's Decision in these cases and subsequent exceptions and responsive briefing, the Board, on October 31, 2019, issued its Notice and Invitation to File Briefs. Specifically, the Board invited the parties to address the impact of the Board's recent decision in *MV Transportation, Inc.*, 368 NLRB No. 66 (2019) on the merits of these cases. Due to the recent nature of the *MV Transportation* decision, and the still-developing body of law following that decision, Counsel for the General Counsel respectfully requests additional time to consider and adequately address the important questions raised by the Board. Such an extension will afford the General Counsel the time necessary to sufficiently, and succinctly, analyze whether *MV Transportation* has any applicability to the instant cases, and sufficiently respond to the Board's questions.

For the foregoing reasons, the undersigned respectfully requests that the Board grant a 30-day extension for the filing of briefs responsive to the Board's Notice and Invitation to File Briefs.

Dated: December 11, 2019

Respectfully submitted,

/s/ Daniel A. Goode

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CERTIFICATE OF SERVICE

December 11, 2019

I hereby certify that I served General Counsel's Motion for an Extension to File a Supplemental Brief Pursuant to the Board's Invitation to File Briefs by electronic mail to the following parties:

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