

**UNITED STATES OF AMERICA
NATIONAL LABOR RELATIONS BOARD
FOURTH REGION**

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|--------------------|---|------------------------|
| LEHIGH UNIVERSITY, | : | |
| | : | |
| Employer | : | Cases 04-CA-243399 and |
| and | : | 04-CA-247234 |
| | : | |
| HOLLY FERENO, | : | |
| | : | |
| An Individual | : | |
| _____ | : | |

**MOTION BY LEHIGH UNIVERSITY
TO POSTPONE HEARING**

NOW COMES Lehigh University, by its attorneys, White and Williams LLP, Nancy Conrad, Esquire and John K. Baker, Esquire, pursuant to Rules 102.16(b) and 102.24(a) of the Rules and Regulations of the National Labor Relations Board (“the Board”), and respectfully moves for an Order postponing the hearing in this matter now set for February 18, 2020. In support thereof, Lehigh University avers as follows:

1. On November 22, 2019, the Board issued an Order Consolidating Cases, Consolidated Complaint and Notice of Hearing.
2. In accordance with the Notice of Hearing, the hearing is scheduled for February 18, 2020 at 10:00 a.m. before an administrative law judge of the Board at the Board’s Regional Office in Philadelphia, Pennsylvania.
3. Counsel for Lehigh University is not available on February 18, 2020. In this regard, Nancy Conrad, Esquire, hearing counsel in this matter, is Chair of the Federal Practice Committee of the Bar Association of Lehigh County (“BALC”) and coordinated and is scheduled to moderate as a member of the BALC, a Continuing Legal Education program

sponsored by the BALC and presented by Chief Judge Juan R. Sanchez of the U.S. District Court for the Eastern District of Pennsylvania. The program is entitled “State of the Federal Judiciary of the Eastern District of Pennsylvania and Introduction of New Judges.” The date for this program was scheduled by Chief Justice Sanchez and the announcement establishing the date for the program was published prior to the Board’s issuance of the aforementioned Notice of Hearing.

4. Counsel to the Board, Edward J. Bonett, Jr., Esquire, does not oppose this Motion. Attorney Bonett has no restrictions as to dates he is available, but requests the earliest possible date after the current hearing date of February 18, 2020.

5. Counsel to Ms. Fereno does not oppose this Motion. Counsel has not provided the undersigned with any dates on which she is available for a hearing.

6. Upon receipt of dates from Counsel to Ms. Fereno, Counsel for Lehigh University will provide mutually agreeable dates in 2020.

7. This Motion is being filed more than twenty-one (21) days before the hearing date.

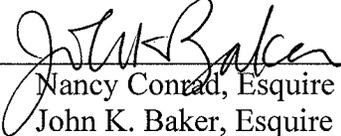
8. In accordance with the Notice accompanying the Notice of Hearing, copies of this Motion are being served simultaneously on all other parties.

9. Lehigh University has not filed any previous motions to reschedule the hearing.

NOW, therefore, Lehigh University respectfully requests that the hearing be postponed and an Order issued rescheduling the hearing.

Respectfully Submitted,

WHITE AND WILLIAMS LLP

By:  _____
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John K. Baker, Esquire
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Dated: January 22, 2020

CERTIFICATE OF SERVICE

I, John K. Baker do hereby certify that on this 22 day of January, 2020, I served a true and correct copy of the foregoing Motion by Lehigh University to Postpone Hearing upon the following persons by electronic and regular mail:

Edward J. Bonett, Jr., Esquire
National Labor Relation Board
Region 4
Wanamaker Building
100 Penn Square East
Suite 4032
Philadelphia, PA 19107
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By:



John K. Baker