



Eckert Seamans Cherin & Mellott, LLC
Two Liberty Place
50 South 16th Street, 22nd Floor
Philadelphia, PA 19102

TEL: 215 851 8400
FAX: 215 851 8383

Brittany L. Stepp, Esq.
215.851.8512
bstepp@eckertseamans.com

February 25, 2020

VIA REGULAR MAIL

M. Kathleen McKinney
Regional Director
National Labor Relations Board
Region 15
600 S. Maestri Pl., 7th Floor
New Orleans, LA 70130-34

Re: Case Nos. 15-CA-232136, 15-CA-232787, 15-CA-243480

Dear Regional Director McKinney:

As you know, we represent MSA Security in the above-referenced matters. A hearing is currently scheduled to take place in Memphis on May 4, 2020, at 9:00 a.m. Unfortunately, after previously postponing this hearing on its own accord, and not at our request, the Region did not consult us as to our availability prior to rescheduling the hearing for May 4th. We are not available that week, as David Weissman, who will serve as first-chair at the hearing, has negotiations in another matter. We therefore request an adjournment and propose the following alternative dates: the week of June 15, 2020 or the week of June 22, 2020.

Following an initial inquiry regarding rescheduling, the Region suggested that we include detail as to why we are not proposing an alternative dates for May. Again, David Weissman is engaged in negotiations and will be traveling for other matters. Then, I will be out of the office during the last week of May because I am in a wedding. Following that, June 15th and 22nd are the earliest dates that both David Weissman and I are available. Additionally, settlement discussions remain ongoing. We will be discussing these matters before Administrative Law Judge Green in Brooklyn at a settlement conference on March 4, 2020. There is certainly the potential for some or all of these matters to be amicably resolved then.

We also provided notice of this request and sought input as to alternative hearing dates from Brandon Hawkins, Gerald Coleman, and Richard DeLeon. Mr. Hawkins opposed our request to reschedule, but provided no reason as to why. Mr. DeLeon likewise opposed, and stated that he

understood we have personal conflicts but that he did not want to wait until June. Mr. Coleman offered no response. Respectfully, we are not asking for a lengthy adjournment; if the hearing is rescheduled for June 15th, that is 30 business days after May 4th.

Additionally, a copy of this letter has been simultaneously served by mail as follows:

Brandon Hawkins
9075 Triple Crown Loop W
Southaven, MS 38671-5028

Gerald Coleman
651 Wall Hill Farms Road, 7th Floor
Byhalia, MS 38611

Richard DeLeon
950 Lakemont Cove
Southaven, MS 38670

For the foregoing reasons, we respectfully request an adjournment and for this hearing to be rescheduled to begin on June 15 or June 22, 2020.

Very truly yours,

A handwritten signature in blue ink, appearing to read "Brittany L. Stepp", with a stylized flourish extending to the right.

Brittany L. Stepp, Esq.