



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

April 2, 2020

VIA ELECTRONIC FILING

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, the Region did not consult with us as to our availability prior to rescheduling the hearing for that date. Despite this, our prior written request for a postponement was denied. We are now writing to renew our request, due to travel restrictions related to COVID-19.

Pursuant to state and local directives prohibiting travel as well as the policies of this law firm, we are restricted from all travel through April 30, 2020. In addition, our law firm is restricting all air travel through May 31, 2020. Accordingly, because we are unable to travel to Memphis for necessary witness preparation prior to the hearing and because of the high degree of likelihood that such governmental directives restricting travel will be extended into May 2020, we respectfully wish to inform you that we cannot appear for the hearing scheduled for May 4, 2020. As my colleague and I would be traveling from White Plains, NY and Philadelphia, PA, which are both COVID-19 concentrated areas, it would also be morally irresponsible for us to do so.

For the foregoing reasons, we respectfully request an adjournment and for this hearing to be rescheduled for August or September of 2020.

Very truly yours,

/s/ Brittany L. Stepp

Brittany L. Stepp, Esq.