

UNITED STATES COURT OF APPEALS
FOR THE DISTRICT OF COLUMBIA CIRCUIT

ALASKA COMMUNICATIONS SYSTEMS, INC.)	
)	
)	
Petitioner/Cross-Respondent,)	
)	Case No. 20-1032
v.)	Consolidated with No. 20-1069
)	
NATIONAL LABOR RELATIONS BOARD,)	
)	ORAL ARGUMENT NOT YET
)	SCHEDULED
Respondent/Cross-Petitioner.)	

**UNOPPOSED MOTION OF ALASKA COMMUNICATIONS SYSTEMS
HOLDINGS, INC. FOR A 13-DAY EXTENSION OF TIME FOR
FILING ITS BRIEF**

To the Honorable, the Judges of the United States
Court of Appeals for the District of Columbia:

Alaska Communications Systems Holdings, Inc. (the “Company”), by its counsel and with the consent of the National Labor Relations Board (the “Board”), respectfully moves that the time for filing the Company’s reply brief be extended from July 21, 2020 to August 3, 2020. In support of its motion, the Company shows as follows:

1. On April 6, 2020, the Court issued a scheduling order under which the Company was to file its opening brief on May 18, the Board was to file its answering brief by June 17, and the Company was to file its reply, if any, by July 8, 2020.

2. The Company filed its brief as scheduled on May 18.
3. Board Counsel requested, and Company counsel did not oppose, a 13-day extension for its answering brief on June 1, 2020. The Court granted the Board's motion on June 2, 2020, and revised the briefing schedule to move the Board's answering brief to June 30, 2020, with the Company's reply brief now due on July 21, 2020.
4. Company counsel with primary responsibility for supervising the Company's brief in this case, Matthew Kelley, spent six weeks earlier this spring on Family and Medical Leave to care for his spouse, diagnosed with a serious illness. Two weeks ago, Mrs. Kelley had a suspected relapse of her serious illness that caused Company counsel to spend much of that time assisting his spouse through diagnosis and treatment.
5. Further, Company counsel has additional work commitments including responsibilities for representing clients in activities related to pending RC petition 06-RC-261852 and previously scheduled collective bargaining related to 22-RC-241450.
6. The combination of Company counsel's family and work commitments make it impossible for Company counsel, with due diligence to prepare and file Company's reply brief on July 21, as currently scheduled. To allow sufficient time for preparation of the brief, while also accommodating

Company counsel's other commitments, the Company respectfully requests a 13-day extension of time, to and including August 3, 2020, to file its brief.

7. The Company has not previously requested an extension of time in this case.

8. Company counsel has informed Board Counsel Brady Francisco-Fitzmaurice. He has stated that he does not oppose Company's proposed 13-day extension.

WHEREFORE, the Company respectfully requests that the Court grant this motion and extend the time for filing the Company's reply from July 21, 2020 to August 3, 2020.

Respectfully submitted,

OGLETREE, DEAKINS, NASH,
SMOAK & STEWART, P.C.

/s/ Matthew J. Kelley

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Attorneys for Petitioner/Cross-Respondent

Dated this 15th day of July, 2020.

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CERTIFICATE OF COMPLIANCE

Pursuant to Federal Rule of Appellate Procedure 32(g)(1), the Board certifies its motion contains 396 words of proportionally-spaced, 14-point type, the word processing system used was Microsoft Word 2010.

Respectfully submitted,

OGLETREE, DEAKINS, NASH,
SMOAK & STEWART, P.C.

/s/ Matthew J. Kelley

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CERTIFICATE OF SERVICE

I hereby certify that on July 15, 2020, I electronically filed the foregoing document with the Clerk of the Court for the United States Court of Appeals for the District of Columbia by using the CM/ECF system. I certify that the participants in the case are registered CM/ECF users and that service will be made by the CM/ECF system.

Respectfully submitted,

OGLETREE, DEAKINS, NASH,
SMOAK & STEWART, P.C.

/s/ Matthew J. Kelley

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