UNITED STATES COURT OF APPEALS
FOR THE DISTRICT OF COLUMBIA CIRCUIT

SERVICE EMPLOYEES INTERNATIONAL UNION HEALTHCARE PENNSYLVANIA, CTW, CLC,	)	
Petitioner,	)	
v.	)	Case No. 19-1137
NATIONAL LABOR RELATIONS BOARD,	)	
Respondent.	)	

FIFTEENTH UNOPPOSED MOTION TO EXTEND DEADLINES FOR THIRTY DAYS

Pursuant to Federal Rule of Appellate Procedure 26(b), Petitioner SEIU Healthcare Pennsylvania, CTW, CLC ("SEIU Healthcare PA") hereby files this unopposed motion for the Court to extend by thirty days, all deadlines contained in the Court's Order dated August 25, 2020, as well as the deadline in Federal Rule of Appellate Procedure 15(d) for the Employer affected by this agency decision, UPMC Presbyterian Shadyside, to file a motion to intervene. As grounds for this motion, Petitioner states the following:

1. This case is related to the cases consolidated at Case Nos. 18-1237, 18-1332, 18-1333, and 18-1334 ("Consolidated Cases").

2. The parties in this action, and the Employer, UPMC Presbyterian

Shadyside, are the same as the parties in the Consolidated Cases.

3. The Decision and Order of the National Labor Relations Board for which the Petitioner seeks review in the instant case arises out of the same unfair labor practice proceeding which is the subject of the appeals in the Consolidated Cases.

4. On July 10, 2019, this Court granted the parties' motion to hold the Consolidated Cases in abeyance, pending further order of the Court, while they formalized and executed a settlement agreement which had been reached in mediation through this Circuit's Appellate Mediation Program on June 27, 2019.

5. The parties in the instant appeal have reached an agreement that would resolve this case in lieu of further proceedings in this Court. This agreement is related to the settlement of the Consolidated Cases, and the parties have agreed that the terms of the instant agreement will be included in the formalized settlement agreement for the Consolidated Cases.

6. The parties have invited the mediators from the Circuit's Appellate Mediation Program to assist them in finalizing the settlement of the Consolidated cases and are currently working on the final terms of the settlement.

7. Federal Rule of Appellate Procedure 26(b) provides that "for good cause, the court may extend the time prescribed by these rules or by its order to perform any act, or may permit an act to be done after that time expires."

8. Accordingly, the parties request a thirty-day extension of the deadlines contained in the Court's Order dated August 25, 2020, as well as the deadline in Federal Rule of Appellate Procedure 15(d) for UPMC Presbyterian Shadyside to file a motion to intervene, to allow time for the agreement to be formalized and executed.

9. Postponement of these deadlines will permit the parties time to include the terms of the instant settlement in the agreement being formalized for the Consolidated Cases.

10. Postponement will conserve resources and serve the interests of judicial economy.

11. Counsel for Petitioner has conferred with counsel for the Respondent National Labor Relations Board and counsel for the Employer, UPMC Presbyterian Shadyside, and all parties consent to this request for an extension of these deadlines.

12. This is the parties' fifteenth request for an extension of the deadlines in this case.

13. If this Motion were to be granted, the applicable deadlines for Petitioner and the Employer, UPMC Presbyterian Shadyside would be extended to October 26, 2020 and other deadlines (for filing the Certified Index to the Record and Dispositive Motions) would be extended to November 9, 2020.

WHEREFORE, Petitioner SEIU Healthcare PA respectfully requests a thirty day extension of all deadlines in the instant case, including the deadline in Federal Rule of Appellate Procedure 15(d) for the Employer UPMC Presbyterian Shadyside to file a motion to intervene.

Dated: September 18, 2020 Respectfully submitted,

____/s/ Elizabeth (Betty) Grdina____
ELIZABETH (BETTY) GRDINA
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CERTIFICATE OF COMPLIANCE

Pursuant to Federal Rule of Appellate Procedure 32(g)(1), Petitioner certifies that this motion contains 822 words of proportionally spaced, 14-point type, and that the word-processing system used was Microsoft Word 2016.

____/s/ Elizabeth (Betty) Grdina____
ELIZABETH (BETTY) GRDINA

CERTIFICATE OF SERVICE

I hereby certify that on September 18, 2020, I electronically filed the foregoing motion with the Clerk of the Court for the United States Court of Appeals for the District of Columbia Circuit by using the CM/ECF system. I certify that the foregoing document will be served via the CM/ECF system on all parties or their counsel of record. A copy has also been served by regular U.S. Mail and by email, upon Counsel for UPMC Presbyterian Shadyside at the address below:

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Dated: September 18, 2020

____/s/ Elizabeth (Betty) Grdina____
ELIZABETH (BETTY) GRDINA