

**UNITED STATES COURT OF APPEALS  
FOR THE FIRST CIRCUIT**

INTERNATIONAL SHIPPING AGENCY, INC., et al	)	
	)	No. 20-1565
	)	20-1730
Petitioners/Cross Respondents	)	
	)	Board Case Nos.
v.	)	24-CA-091723 et. al.
	)	
NATIONAL LABOR RELATIONS BOARD	)	
	)	
Respondent/Cross-Petitioner	)	
	)	
	)	

**MOTION OF PETITIONERS FOR A 30-DAY EXTENSION  
OF TIME FOR FILING ITS APPELLATE BRIEF**

To: Honorable Judges of the United States  
Court of Appeals for the First Circuit:

Petitioners, International Shipping Agency, Inc., Marine Terminal Services, Inc., and Truck Tech Services Inc., by its undersigned counsel, respectfully moves this Court for a 32-day extension of time, from October 30, 2020 to and including December 1, 2020, for filing Petitioner’s appellate brief, and shows in support:

1. On September 15, 2020, Petitioners, with the consent of Respondents, requested an extension of time in the briefing schedule of this case to allow for settlement discussions.

2. On September 16, 2020, the Court granted Petitioners’ request for

an extension, and the time for the initial brief and appendix in this matter was enlarged to and including October 30, 2020.

3. The parties have and continue to engage in settlement discussions. At this time, Respondents have requested from Petitioner certain information for Respondent to review and/or possibly propose a settlement counteroffer. The parties understand that to be able to compile the voluminous information and documents requested for all parties to review them in a meaningful way, an additional extension of time in the briefing schedule is needed.

4. Considering the above, a thirty-two (32)<sup>1</sup> days extension, to and including December 1, 2020, is requested to retrieve and compile the requested information and documents and continue settlement discussions.

5. Respondent does not oppose Petitioners' request for an additional extension of time to file its brief and appendix.

**WHEREFORE**, Petitioner respectfully requests that the Court grant Petitioner's motion for a 32-day extension of time, to and including December 2, 2020 to file its brief and appendix.

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<sup>1</sup> Thursday, November 26<sup>th</sup> is Thanksgiving.

Respectfully submitted,

Counsels for Petitioner:

/s/ Antonio Cuevas Delgado

Antonio Cuevas Delgado (#23743)  
CUEVAS KUINLAM, MARQUEZ &  
O'NEILL  
416 Escorial Avenue, Caparra  
Heights  
San Juan, PR 00920  
(787) 985-9164  
acuevas@ckblawpr.com

/s/ Henry P. Gonzalez, LL.M

Henry P. Gonzalez, LL.M.  
Gonzalez del Valle Law  
1250 Connecticut Avenue, N.W. Suite 700  
Washington, DC 20036  
Tel: (202) 973-2980  
gonzalez@gdvlegal.com

Dated at San Juan, Puerto Rico  
this 7<sup>th</sup> day of October 2020

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NATIONAL LABOR RELATIONS BOARD	)	
	)	
Respondent	)	

**CERTIFICATE OF COMPLIANCE**

Pursuant to Federal Rule of Appellate Procedure 27(d)(2), Petitioner certifies that this motion contains 392 words of proportionally spaced, 14-point type, and the word processing system used was LibreOffice Writer.

/s/ Antonio Cuevas Delgado, Esq.

Antonio Cuevas Delgado (# 23743)  
CUEVAS KUINLAM, MARQUEZ &  
O'NEILL  
416 Escorial Avenue, Caparra Heights  
San Juan, PR 00920  
(787) 985-9164  
acuevas@ckblawpr.com  
Counsel for Petitioner

Dated at San Juan, Puerto Rico  
this 7<sup>th</sup> day of October 2020

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	)	
Respondent	)	

**CERTIFICATE OF SERVICE**

I hereby certify that on October 6, 2020, the undersigned electronically filed the foregoing document with the Clerk of the Court for the United States Court of Appeals for the First Circuit by using the CM/ECF system, and that all counsel are registered CM/ECF users.

/s/ Antonio Cuevas Delgado, Esq.

Antonio Cuevas Delgado (# 23743)  
CUEVAS KUINLAM, MARQUEZ &  
O'NEILL  
416 Escorial Avenue, Caparra Heights  
San Juan, PR 00920  
(787) 985-9164  
acuevas@ckblawpr.com

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