

**UNITED STATES OF AMERICA  
BEFORE THE NATIONAL LABOR RELATIONS BOARD  
REGION 9**

PROMOWEST PRODUCTIONS, INC.,	:	Case 09-RC-261089
	:	
Employer	:	
v.	:	
	:	
INTERNATIONAL ALLIANCE OF	:	
THEATRICAL STAGE EMPLOYEES AND	:	
MOVING PICTURE TECHNICIANS, ARTISTS	:	
AND ALLIED CRAFTS OF THE UNITED	:	
STATES AND CANADA, AFL-CIO (IATSE)	:	
LOCAL 12	:	
	:	
Petitioner.	:	

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**REQUEST FOR EXTENSION OF TIME/MOTION FOR LEAVE TO FILE A  
STATEMENT IN OPPOSITION TO EMPLOYER’S REQUEST FOR REVIEW**

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On October 9, 2020, Counsel for the Petition filed a Statement in Opposition to Employer’s Request for Review. That same day, the Associate General Secretary found the submission untimely under Section 102.67(f). For good cause shown and the excusable negligence on the part of Counsel, the Petitioner respectfully asks for leave to file the Statement in Opposition.

On September 2, 2020, the Employer requested an extension of time to file a Request for Review from the Board for two (2) weeks until September 25, 2020 with a corresponding extension of the Union’s opposition filing to October 9, 2020. The Extension was granted on September 3, 2020, and stated: “This extension of time to file requests for review applies to all parties.” It was Counsel’s impression at that time that the extension suggested by Employer’s Counsel of October 9, 2020 was also granted and Counsel calendared the deadline as such.

As it is now understood that this calculation was in error, the Petitioner now asks for leave to file the Statement in Opposition pursuant to Section 102.2(d) outside of the timelines established

as the mistake was inadvertent, Petitioner has acted expeditiously and in good faith to get the Statement of Opposition filed in the timeline she believed to be correct, the Board has yet to make a determination in this matter, and the Employer has not been prejudiced by the late filing.

Respectfully submitted,

s/ Cathrine J. Harshman  
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Counsel for Petitioner IATSE Local 12

### **CERTIFICATE OF SERVICE**

I hereby certify that on October 13, 2020, a copy of the foregoing Motion for Leave to file a Statement in Opposition with corresponding affidavit and exhibits were served on counsel for the Employer at the email address indicated below, and to the Regional Director at [Matthew.Denholm@NLRB.gov](mailto:Matthew.Denholm@NLRB.gov)

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s/ Cathrine J. Harshman