

**UNITED STATE OF AMERICA  
NATIONAL LABOR RELATIONS BOARD  
Region 14**

<b>CARDS NEO, LLC</b>	)	
	)	
<b>Employer,</b>	)	
	)	
<b>and</b>	)	<b>Case No. 14-RC-266528</b>
	)	
<b>TEAMSTERS GENERAL DRIVERS &amp; HELPERS LOCAL UNION # 823</b>	)	
	)	
<b>Petitioner.</b>	)	

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**EMPLOYER’S MOTION FOR POSTPONEMENT**

**CARDS NEO, LLC.** (“Employer”) moves the Regional Director to postpone the pre-election hearing in this matter currently scheduled for October 15, 2020 and consecutive days as needed. In support of its request, the Employer, states as follows:

1. The undersigned representative, James Allen (“Allen”) has had a family emergency arise which will prevent his participation.
2. Allen is out of town and away from home in Tampa, Florida for family vacation. Mr. Allen was prepared to participate in the hearing from the remote location in Tampa without issue.
3. On Monday October 12, 2020, Allen’s seventy-seven (77) year old father-in-law was involved in a serious rollover automobile accident. The accident facilitated an unexpected emergency return home to Cincinnati, Ohio for Allen’s wife on Monday evening, October 12, 2020.
4. Due to Covid-19 restrictions on persons permitted at the hospital, Allen’s two (2) year old child remained with him in Tampa, Florida.
5. Allen does not have childcare which would permit him to participate uninterrupted in the Zoom hearing as scheduled and is more than nine hundred (900) miles from the closest family or friend able to assist.
6. Allen’s father-in-law’s condition required admission to the hospital.
7. Allen’s wife, as the medical power of attorney, must remain with her father in Cincinnati.

8. Allen must arrange travel home early for him and his toddler daughter.
9. In deference to the need for as much notice as possible in these matters, this filing has been made at the earliest possible time.
10. Allen has reached out to union representative, Shawn Lashmet (“Lashmet”) concerning the union’s position on postponement. Lashmet indicated that postponement is not opposed by the union.
11. Lashmet indicated that the union agrees to postponement until Tuesday October 20, 2020.
12. In an effort to avoid delay, the Employer offers October 20, 2020 as an alternative start date.
13. Should October 20, 2020 be unavailable, the Respondent offers October 19, 2020.
14. The undersigned is not seeking excessive delay.
15. The undersigned does not seek delay for an unreasonable cause.
16. Any delay is not intended to be prejudicial.
17. All parties have been served with this motion.

**WHEREFORE**, CARDS NEO, LLC. prays the Regional Director postpone the hearing currently scheduled for Thursday, October 15, 2020 and consecutive days, via Zoom videoconference and such other relief as the Regional Director finds appropriate.

Respectfully submitted:

/s/ James Allen  
**JAMES P. ALLEN, JR.**  
*Managing Partner*  
**National Labor Relations Advocates**  
312 Walnut Street, STE 1600  
Cincinnati, OH 45202  
(513) 646-3600  
*Representative for CARDS NEO, LLC*

**CERTIFICATE OF SERVICE**

This is to certify that service of the above and foregoing EMPLOYER’S MOTION FOR POSTPONEMENT has been made on Region 14 of the National Labor Relations Board on October 13, 2020 via the Agency’s e-filing portal, and courtesy copies have been electronically served on the following parties, namely:

Amy Novara, Field Examiner  
National Labor Relations Board  
Region 14 - Tulsa Resident Office  
224 S Boulder, Suite 322, Tulsa, OK 74103  
[Amy.Novara@nlrb.gov](mailto:Amy.Novara@nlrb.gov)

Shawn Lashmet  
President & Business Agent  
Teamsters General Drivers & Helper Local Union 823  
1601 S Maiden Ln  
Joplin, MO 64801  
[shawnlashmet@yahoo.com](mailto:shawnlashmet@yahoo.com)

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James Allen  
Burdzinski & Partners