

**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 45-day extension of time, from December 1, 2020 to and including January 15, 2020, for filing Petitioner’s appellate brief, and shows in support:

1. As memorialized through the previous motions and requests, the parties in this case have been in constant settlement discussions in an attempt to avoid further proceedings in this matter. To allow for this process, two previous extensions of time have been requested and granted to file the initial brief and

appendix in this case. As a consequence, the time for these initial filings had been enlarged to and including December 1, 2020.

2. The parties have and continue to engage in settlement discussions. At this time, Petitioner has provided Respondent documents and information for review, and Respondent is reviewing these disclosures as well as determining its response and/or counter-proposal. Given the amount of information involved in this matter relevant to any particular settlement proposal, the parties understand that to be able to compile the required information, as well as consider and discuss possible proposals in a meaningful way, an additional extension of time in the briefing schedule is needed.

3. Considering the above, a forty-five (45)¹ days extension, to and including January 15, 2021, is requested to retrieve and compile the requested information and documents and continue settlement discussions.

4. 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 45-day extension of time, to and including January 15, 2021 to file its brief and appendix.

¹ The proposed extension is made taking into consideration customary Holidays during the month of December.

Respectfully submitted,

Counsels for Petitioner:

/s/ Antonio Cuevas Delgado

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Dated at San Juan, Puerto Rico
this 12th day of November 2020

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)
 Respondent)

CERTIFICATE OF COMPLIANCE

Pursuant to Federal Rule of Appellate Procedure 27(d)(2), Petitioner certifies that this motion contains 356 words of proportionally spaced, 14-point type, and the word processing system used was LibreOffice Writer.

/s/ Antonio Cuevas Delgado, Esq.

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Dated at San Juan, Puerto Rico
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CERTIFICATE OF SERVICE

I hereby certify that on November 12, 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.

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