

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

**FRONTIER COMMUNICATIONS
CORPORATION,**

Respondent,

and

**COMMUNICATIONS WORKERS OF
AMERICA, DISTRICT 2-13,**

Charging Party.

CASE 09-CA-247015

**RESPONDENT’S REQUEST FOR EXTENSION OF TIME TO FILE
EXCEPTIONS AND A BRIEF IN SUPPORT OF THE EXCEPTIONS**

Frontier Communications Corporation (“Frontier” or “Respondent”), pursuant to Section 102.2(c) of the Rules and Regulations of the National Labor Relations Board (“Board”), submits this Request for Extension of Time to File Exceptions and a Brief in Support of the Exceptions, and in support thereof states as follows:

1. The General Counsel’s December 10, 2019 Complaint against Frontier was litigated in a one-day trial via videoconference on August 25, 2020.
2. On October 14, 2020, Administrative Law Judge (“ALJ”) Geoffrey Carter issued his Decision in the above-captioned matter finding that Frontier violated the National Labor Relations Act in certain respects. That same day, the Board Ordered that this case be transferred to and continued before the Board.
3. Pursuant to Section 102.46(a) of the Board’s Rules and Regulations, Frontier plans to file Exceptions and a Brief in Support of Exceptions.

4. The due date for the receipt in Washington, D.C. of Exceptions to the Administrative Law Judge's Decision and Brief in Support of Exceptions is currently November 25, 2020. *See* October 28, 2020 Letter from Leight A. Reardon, Associate Executive Secretary.

5. Due to previously scheduled professional and personal commitments of Frontier's counsel, Frontier respectfully requests a 7-day extension to the November 25, 2020 deadline.

6. If this request is granted, Frontier's new deadline to file Exceptions and a Brief in Support of Exceptions will be December 2, 2020.

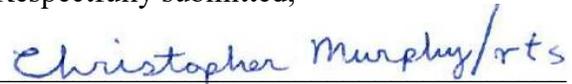
7. Counsels for the General Counsel and the Charging Party Union Communications Workers of America, District 2-13, have been contacted concerning this request and they have both have agreed to the extension.

8. No further extensions to this deadline will be sought by Respondent.

For all the foregoing reasons, Respondent respectfully requests that its request for an extension of time to file Exceptions and a Brief in Support of Exceptions be granted.

Dated: November 19, 2020

Respectfully submitted,

Handwritten signature of Christopher J. Murphy in blue ink, with the initials 'rts' at the end.

Christopher J. Murphy
Morgan, Lewis & Bockius LLP
1701 Market Street
Philadelphia, PA 19103-2921
Phone: +1.215.963.5601
Fax: +1.215.963.5001
Email: christopher.murphy@morganlewis.com

Ryan T. Sears
Morgan, Lewis & Bockius LLP
1111 Pennsylvania Avenue, NW
Washington, DC 20004
Phone: +1.202.739.5077
Fax: +1.202.739.3001
Email: ryan.sears@morganlewis.com

*Counsel for Respondent
Frontier Communications*

CERTIFICATE OF SERVICE

I hereby certify that on November 19, 2020, I caused a copy of the foregoing Respondent's Request for Extension of Time to File Exceptions and a Brief in Support of the Exceptions in NLRB Case No. 09-CA-247015 to be delivered to the following individuals:

Stephen Pincus
Noah Fowle
Counsel for the General Counsel
National Labor Relations Board - Region 8
1240 E. 9th Street, Room 1695
Cleveland, OH 44199-1086
stephen.pincus@nlrb.gov
noah.fowle@nlrb.gov
Via E-mail

Regional Director
National Labor Relations Board - Region 9
550 Main Street, Room 3-111
Cincinnati, OH 45202-3271
Via Separate E-filing

Letha Perry
Administrative Director
Communications Workers of America, District 2-13
Charging Party
900 Lee Street East, Suite 1212
Charleston WV 25301
Lperry@cwa-union.org
Via E-Mail

Joseph Richardson
Attorney for Charging Party
Willig, Williams & Davidson
1845 Walnut St., 24th Fl.
Philadelphia, PA 1910
jrichardson@wwdlaw.com
Via E-Mail

The same document was then e-filed the same day with the National Labor Relations Board, Office of the Executive Secretary in Washington, DC.

Ryan Sears

Dated: November 19, 2020

Ryan T. Sears
Morgan, Lewis & Bockius LLP
1111 Pennsylvania Avenue, NW
Washington, DC 20004
Phone: +1.202.739.5077
Fax: +1.202.739.3001
Email: ryan.sears@morganlewis.com

Counsel for Respondent
Frontier Communications