

**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 31-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 31-day extension of time, from January 15, 2021 to and including February 15, 2021, 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 to avoid further proceedings in this matter. To allow for this process, several previous extensions of time have been requested and granted to file the initial brief and

appendix in this case. Therefore, the time for these initial filings had been enlarged to and including January 15, 2021.

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 in turn conducting its own review process including contacting former employees to be able to respond to Petitioner's settlement offer. Given the amount of information and persons involved in this matter relevant to any settlement proposal, the parties understand that to be able to conclude this process, 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 thirty-one (31) days extension, to and including February 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 31-day extension of time, to and including February 15, 2021 to file its brief and appendix.

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 29th day of December 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 322 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
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)
 Respondent)

CERTIFICATE OF SERVICE

I hereby certify that on December 28, 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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