

**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 THIRTY DAYS
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 thirty (30) days extension of time, from February 16, 2021, to and including March 18, 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 February 16, 2021.

2. The parties have and continue to engage in settlement discussions. At this time, after Petitioner provided Respondent documents and information for review, Respondent recently informed Petitioner of its position regarding a possible settlement. Petitioner now needs to consider Respondent's response for which it is necessary to follow certain Corporate governance provisions and conduct the necessary internal analysis. 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 (30) days extension, to and including March 18, 2021, is requested to complete the process of reviewing the offer and respond appropriately.

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 thirty (30) days extension of time, to and including March 18, 2021 to file its brief and appendix.

Respectfully submitted,

Counsels for Petitioner:

/s/ Antonio Cuevas Delgado

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Dated at San Juan, Puerto Rico
this 29th day of January 2021.

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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 316 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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Counsel for Petitioner

Dated at San Juan, Puerto Rico
this 29th day of January 2021.

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 NATIONAL LABOR RELATIONS BOARD)
)
 Respondent)

CERTIFICATE OF SERVICE

I hereby certify that on January 29, 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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Dated at San Juan, Puerto Rico
this 29th day of January 2020.