



March 4, 2021

BY E-FILE

National Labor Relations Board  
Office of the Executive Secretary  
Attention: Leigh Reardon  
1015 Half Street, SE  
Washington, DC 20570

Re: Cascades Containerboard Packaging  
Case Nos. 03-CA-242367, et al . . . .

Dear Ms. Reardon:

I represent Cascades Containerboard Packaging – Niagara, a Division of Cascades Holding US Inc. (hereafter, “Cascades”) as the Respondent in the above-referenced cases. I am in receipt of your letter from earlier today, which is addressed to my partner, Don Carmody, where you advise that your office has denied Cascades’ request for an extension of time to respond to a Motion for Clarification that was recently filed with your office by the General Counsel. In actuality, Cascades’ intention was to seek an extension to the deadline for a Motion for Reconsideration under Section 102.48(c) of the Board’s Rules and Regulations in connection with the Decision and Order that the Board issued in these cases on February 9, 2021 (hereafter, the “Decision”). I apologize for any confusion, which appears to have occurred as part of preparing and submitting the request in the agency’s e-filing system.

In any event, by my letter to you here, Cascades respectfully requests an extension of time to file the Motion for Reconsideration, which is presently due next Tuesday, March 9, 2021. Insofar as the Motion for Clarification opens the possibility that the Board may modify the Decision, Cascades respectfully submits that, logically, the Motion for Reconsideration should not be filed before the Board rules upon the General Counsel’s Motion. Accordingly, Cascades respectfully

Carmody & Carmody LLP, 134 Evergreen Lane, Glastonbury, CT 06033  
O. (860) 430-9437 C. (203) 249-9287  
bcarmody@carmodyandcarmody.com



requests that the deadline for the Motion for Reconsideration be extended from March 9, 2021 to fourteen (14) days following the day on which the Board issues an Order ruling upon the Motion for Clarification.

Alternatively, for reasons separate and apart from the Motion for Clarification, Cascades respectfully requests that the deadline for the Motion for Reconsideration be extended from March 9, 2021 to March 22, 2021. Don Carmody is Cascades' lead attorney. On February 10, 2021, Mr. Carmody received the COVID vaccine, but unfortunately, over the course of the next several days, experienced a number of side effects that substantially restricted his ability to work. Mr. Carmody is scheduled to receive the follow-up COVID vaccine today. He has been advised there is a probability that these same side effects will reoccur and possibly for a longer duration and with greater intensity. Accordingly, Mr. Carmody has every reason to believe that, between today and the current deadline for the Motion for Reconsideration, he will be substantially restricted in his ability to prepare the Motion for Reconsideration.

I have brought Cascades' requested extension for the Motion for Reconsideration to the attention of Jessica Cacaccio, Counsel for the General Counsel, who advised me that the General Counsel opposes any extension to the current deadline. I have also brought the requested extension to the attention of Nicholas Scotto, Counsel for the Charging Party, who has advised me that the Charging Party opposes an extension tied to the Board's ruling on the Motion for Clarification, but does not oppose Cascades' alternative request for an extension up to and including March 22, 2021.

Respectfully submitted,

/s/ \_\_\_\_\_

Bryan T. Carmody

cc: Jessica Cacaccio, Counsel for the General Counsel, *via* e-mail  
Nicholas Scotto, Counsel for the Charging Party, *via* e-mail