

**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 TWENTY NINE 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 twenty nine (29) days extension of time, from March 18, 2021, to and including April 16, 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 March 18, 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. Petitioners have in turn made an offer to Respondent that it is in the process to consider and provide a response to. The parties understand that to be able to conclude this process, and execute the required documentation if an agreement comes to fruition or engage in the briefing process if it does not, an additional extension of time in the briefing schedule is needed.

3. Considering the above, a twenty nine (29) days extension, to and including April 16, 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 twenty nine (29) days extension of time, to and including

April 16, 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 5th day of March 2021.

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Respondent)	

CERTIFICATE OF COMPLIANCE

Pursuant to Federal Rule of Appellate Procedure 27(d)(2), Petitioner certifies that this motion contains 326 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 5th day of March 2021.

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Respondent)

CERTIFICATE OF SERVICE

I hereby certify that on March 5th, 2021, 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 5th day of March 2021.