UNITED STATES OF AMERICA
BEFORE THE NATIONAL LABOR RELATIONS BOARD

MILUM TEXTILE SERVICES CO.

and **Cases 28-CA-20898**
28-CA-20906
28-CA-20973
28-CA-21050
28-CA-21203

UNITE HERE!

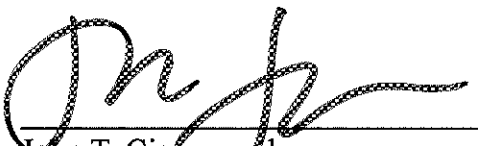
COUNSEL FOR THE GENERAL COUNSEL'S MOTION TO STRIKE RESPONDENT'S ANSWERING BRIEF

Pursuant to Section 102.46(j) of the Board's Rules and Regulations, Counsel for the General Counsel moves to strike Respondent's Answering Brief in the above-captioned matter. The Board should grant this motion because Respondent's brief, electronically filed on January 7, 2008, is 98 pages, excluding the table of contents and table of authorities. This exceeds the 50-page limit imposed by Section 102.46(j). Section 102.46(j) is explicit that a party may not exceed this limit absent permission "obtained from the Board by motion, setting forth the reasons therefor, filed not less than 10 days prior to the date the brief is due." No such permission was sought, or received, in this matter. Accordingly, the Board

should strike Respondent's Answering Brief. See *Wal-Mart Stores, Inc.,* 343 NLRB 579 (2004).

Dated at Phoenix, Arizona, this 9th day of January 2008.

Respectfully submitted,



John T. Giannopoulos
Counsel for the General Counsel
National Labor Relations Board, Region 28
2600 North Central Avenue, Suite 1800
Phoenix, AZ 85004-3099
Telephone: (602) 640-2123
Facsimile: (602) 640-2178

CERTIFICATE OF SERVICE

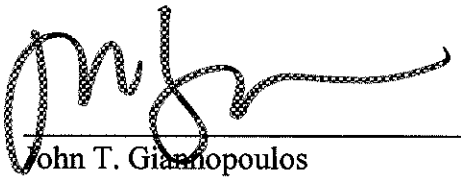
I hereby certify that a copy of COUNSEL FOR THE GENERAL COUNSEL'S MOTION TO STRIKE RESPONDENT'S ANSWERING BRIEF, Cases 28-CA-20898 et al., was served via E-Gov, E-filing and by facsimile this 9th day of January 2008, on the following:

E-Gov, E-Filing to:
Lester A. Heltzer, Executive Secretary
Office of the Executive Secretary
National Labor Relations Board
1099 14th Street, NW, Room 11602
Washington, DC 20570-0001

Via Facsimile and e-mail (by permission) to:

Laurie Laws, Attorney at Law
Gregory A. Robinson, Attorney at Law
Farley, Robinson and Larsen
6040 North 7th Street, Suite 300
Phoenix, AZ 85014-1803
Facsimile: 602-264-5116
E-Mail: Laurie@laurielaws.com

Ira J. Katz, Associate General Counsel
UNITE HERE!
275 7th Avenue, 10th Floor
New York, NY 10001
Facsimile: 206-202-3047
E-Mail: Ikatz@unitehere.org



John T. Giannopoulos
Counsel for the General Counsel
National Labor Relations Board, Region 28
2600 North Central Avenue, Suite 1800
Phoenix, Arizona 85004
Telephone: (602) 640-2123
Facsimile: (602) 640-2178