



settlement negotiations while simultaneously preparing for the hearing in the event settlement did not take place in Case Nos. 37-CA-7116 et al. Settlement was reached on Wednesday, March 12, and Counsel for *HTH* did not return to the mainland until the evening of Friday, March 14, 2008.

Counsel to *HTH* contacted Counsel to the General Counsel to obtain her position; Counsel to the General Counsel has indicated opposition to this request.<sup>1</sup>

This is a voluminous case, touching upon over one dozen issues. The hearing itself went on for seven (7) days, eighteen (18) witnesses, over 150 exhibits, and a transcript approaching 1300 pages. Based on the length of the Record, the number of charges, the length of the Opinion, the novel legal theories involved, and the number of intended exceptions to findings, *HTH* will need more time and pages to fully address the issues. Accordingly, *HTH* submits this Motion

Counsel for *HTH* also has a number of other commitments which factor in to this request:

- A case before the U.S. Court of Appeals for the D.C. Circuit with a brief and appendix are due March 31, 2008.
- A case before the U.S. Court of Appeals for the Fourth Circuit with a brief and appendix due on March 31, 2008.
- Counsel for *HTH* will be involved in collective bargaining negotiations in Illinois on March 27<sup>th</sup> and 28<sup>th</sup>.
- Counsel to *HTH* is committed to collective bargaining negotiations for a first time contract in California on April 2<sup>nd</sup> and 3<sup>rd</sup>, 2008.

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<sup>1</sup> Counsel to the General Counsel did not oppose, however, *HTH*'s contemporaneously filed request to exceed 50 pages.

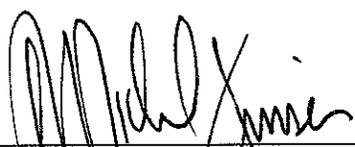
- Counsel for *HTH* also has an arbitration scheduled in Pennsylvania on March 28, 2008.
- Counsel for *HTH* is currently consulting on a Petition for 10(j) injunctive relief in California with a hearing scheduled for March 24, 2008.
- Counsel for *HTH* is also involved in a Petition for Certiorari to the California Supreme Court of a decision from the California Court of Appeals currently due no later than May 7, 2008.

For these reasons, *HTH* respectfully requests an extension of time for filing exceptions from April 3, 2008 to May 5, 2008.

DATED: March 18, 2008  
Nashville, Tennessee

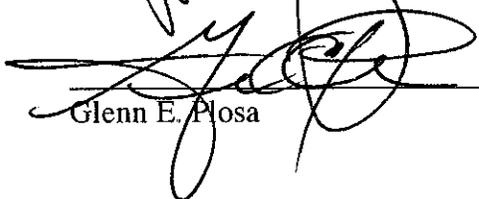
Respectfully submitted,

THE ZINSER LAW FIRM, P.C.



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L. Michael Zinser



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**CERTIFICATE OF SERVICE**

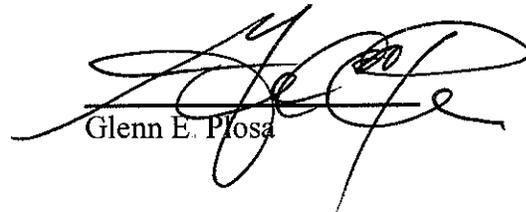
I hereby certify that a true and correct copy of the foregoing MOTION FOR EXTENSION OF TIME TO FILE EXCEPTIONS was served electronically and via Federal Express on this 18th day of March 2008, on the following parties:

Lester Heltzer  
Executive Secretary  
National Labor Relations Board  
1099 14<sup>th</sup> Street, N.W.  
Washington, D.C. 20570-0001

Joseph Norelli, Regional Director  
Region 20  
901 Market Street, Suite 300  
San Francisco, CA 94103-1771

Ms. Meredith Burns, Esq.  
National Labor Relations Board  
SubRegion 37  
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Mr. Wayne Cahill  
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