

**UNITED STATES OF AMERICA
BEFORE THE NATIONAL LABOR RELATIONS BOARD**

DLC CORP. d/b/a LIVE NATION NEW ENGLAND)	
)	
Employer)	
)	
and)	
)	
INTERNATIONAL ALLIANCE OF THEATRICAL STAGE EMPLOYEES, LOCAL 11)	Case No. 1-RC-22162
)	
Petitioner.)	
)	

CONSENT MOTION TO EXTEND DEADLINE TO FILE ANSWERING BRIEF TO UNION’S EXCEPTIONS TO THE HEARING OFFICER’S DECISION & RECOMMENDATION

Pursuant to Section 102.69(j)(3) of the Rules and Regulations of the National Labor Relations Board, Employer DLC Corp. (“DLC”) respectfully requests that the deadline to file its answering brief to the Union’s Exceptions to the Hearing Officer’s Decision and Recommendation in the above-referenced matter be extended seven (7) days until October 28, 2008.

A hearing was held on August 21 and 22 and September 3, 2008 regarding the election objections filed by Petitioner. The Hearing Officer issued his decision and recommendation on Monday, September 29, 2008 making any exceptions to that decision due on Tuesday, October 14, 2008, due to the Columbus Day holiday. As such DLC’s brief in response is due Tuesday, October 21, 2008. DLC seeks a one week extension of this deadline making its brief due on Tuesday, October 28, 2008.

The requested extension is necessary as counsel for the Employer must attend previously scheduled collective bargaining agreement negotiations on behalf of another client during the week of October 20th and will be in negotiations from 10:00 a.m. to 4:00 p.m. on the day of the filing deadline. Given this scheduling conflict, DLC respectfully requests a seven (7) day extension of time to file an answering brief in this matter until October 28, 2008.

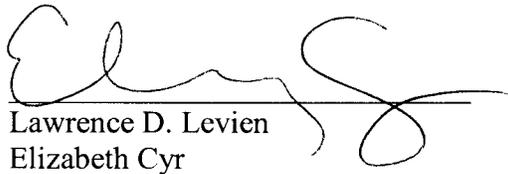
The requested relief will not prejudice the bargaining unit employees as the facility in question, the Comcast Center, is an amphitheatre and therefore has seasonal operations. At this time, DLC has concluded its operations at the Comcast Center for the winter.

Additionally, Petitioner consents to the requested relief.

WHEREFORE, the Employer respectfully requests that the deadline to file its brief in response to the Union's Exceptions to the Hearing Officer's Decision & Recommendation in this matter be extended until October 28, 2008.

Respectfully submitted this 15th day of October, 2008.

By:



Lawrence D. Levien
Elizabeth Cyr

AKIN GUMP STRAUSS HAUER & FELD, LLP
1333 New Hampshire Avenue, NW
Washington, DC 20036
Telephone: (202) 887-4000
Fax: (202) 887-4288

Counsel for DLC Corp.

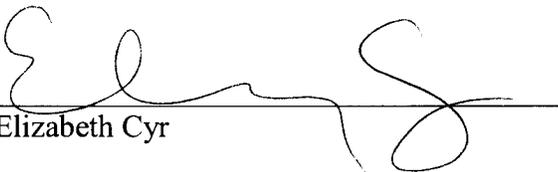
CERTIFICATE OF SERVICE

This is to certify that the undersigned caused to be served on October 15, 2008, the original and eight copies of the Consent Motion to Extend Deadline to File Answering Brief to Union's Exceptions to the Hearing Officer's Decision & Recommendation via e-file and overnight delivery to the following:

Lester Heltzer
National Labor Relations Board
1099 14th Street, NW
Washington, DC 20570-0001
Executive Secretary

Further, this certifies that the undersigned caused to be served on October 15, 2008, a copy of the Consent Motion to Extend Deadline to File Answering Brief to Union's Exceptions to the Hearing Officer's Decision & Recommendation via facsimile and overnight delivery to the following:

Gabriel O. Dumont, Jr.
John D. Burke
Dumont, Morris, Burke, PC
14 Beacon Street, Suite 300
Boston, MA 02108
(617) 227-7025 (fax)
Counsel for IATSE, Local 11 AFL-CIO,


Elizabeth Cyr

AKIN GUMP STRAUSS HAUER & FELD LLP
1333 New Hampshire Ave., N.W.
Washington, DC 20036
(202) 887-4000 (telephone)
(202) 887-4288 (facsimile)

Counsel for DLC Corp.