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UNITED STATES OF AMERICA
BEFORE THE NATIONAL LABOR RELATIONS BOARD

FORTUNA ENTERPRISES, L.P., A
DELAWARE LIMITED PARTNERSHIP
dba THE LOS ANGELES AIRPORT
HILTON AND TOWERS,

AND

UNITE HERE, LOCAL 11

Case Nos. 31-CA-27837
31-CA-27954
31-CA-28011

**RESPONDENT'S REQUEST FOR AN
EXTENSION OF TIME TO FILE ITS
EXCEPTIONS TO THE DECISION OF
THE ADMINISTRATIVE LAW JUDGE
AND ITS BRIEF IN SUPPORT THEREOF**

Pursuant to Sections 102.46 and 102.111 of the Rules and Regulations ("Rules") of the National Labor Relations Board ("Board"), Respondent Fortuna Enterprises, L.P. *d/b/a* The Los Angeles Airport Hilton Hotel and Towers ("Respondent") hereby requests an extension of time to file its Exceptions to the October 21, 2008 Decision of Administrative Law Judge John J. McCarrick and its Brief in Support thereof in the above-referenced matters.

The present deadline for Respondent to file its Exceptions and Brief is November 18, 2008; however, Respondent will not be able to adequately brief this matter by said deadline. This matter contains a lengthy decision, multiple complex legal issues, a voluminous record, and significant credibility issues with respect to numerous witnesses.

The Complaint contains numerous unfair labor practice allegations against Respondent. The record contains 2,352 pages of hearing transcript and voluminous exhibits. Twenty nine witnesses testified at the 17-day hearing, which requires a detailed analysis of various evidentiary and credibility issues.

Accordingly, Respondent respectfully requests that the deadline to file its Exceptions and Brief be extended for thirty (30) days, to December 18, 2008.

Dated: November 13, 2008

Respectfully submitted,

FORD & HARRISON LLP
Stephen R. Lueke
Steven M. Kroll

By: 
Stephen R. Lueke

Attorneys for FORTUNA ENTERPRISES,
L.P., A DELAWARE LIMITED
PARTNERSHIP *d/b/a* THE LOS ANGELES
AIRPORT HILTON AND TOWERS

PROOF OF SERVICE

I, Yolanda H. Dennison, declare:

I am a citizen of the United States and employed in Los Angeles County, California. I am over the age of eighteen years and not a party to the within-entitled action. My business address is 350 South Grand Avenue, Suite 2300, Los Angeles, California 90071. On November 13, 2008, I served a copy of the within document(s):

**RESPONDENT'S REQUEST FOR AN EXTENSION OF TIME TO FILE ITS
EXCEPTIONS TO THE DECISION OF THE ADMINISTRATIVE
LAW JUDGE AND ITS BRIEF IN SUPPORT THEREOF**



by placing the document(s) listed above in a sealed Federal Express envelope and affixing a pre-paid air bill, and causing the envelope to be delivered to a Federal Express agent for delivery.



by serving via electronic transmission the document(s) listed above to the e-mail address(es) set forth below on this date before 5:00 p.m.

Mary Miller Cracraft
Associate Chief Administrative Law Judge
NLRB Division of Judges
901 Market Street, Suite 300
San Francisco, California 94103-1779

Eric B. Myers, Esq.
Davis Cowell & Bowe, LLP
595 Market Street, Suite 1400
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*(Counsel of Charging Party HERE
Local 11)*

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Nathan Laks, Esq.
National Labor Relations Board, Region 31
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(Counsel for the General Counsel)

I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.

I declare that I am employed in the office of a member of the bar of this court at whose direction the service was made.

Executed on November 13, 2008, at Los Angeles, California.


Yolanda H. Dennison

RESPONDENT'S REQUEST FOR AN EXTENSION