

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

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)	
STARBUCKS CORPORATION d/b/a)	
STARBUCKS COFFEE COMPANY,)	Case Nos. 2-CA-37548
)	2-CA-37599
and)	2-CA-37606
)	2-CA-37688
LOCAL 660, INDUSTRIAL WORKERS OF THE WORLD)	2-CA-37689
)	2-CA-37798
)	2-CA-37821
)	2-CA-38187
_____)	

**MOTION TO EXCEED PAGE LIMIT FOR BRIEF IN SUPPORT OF EXCEPTIONS TO
ADMINISTRATIVE LAW JUDGE'S DECISION**

Pursuant to Section 102.46(j) of the National Labor Relations Board's Rules and Regulations, Respondent Starbucks Coffee Company respectfully requests permission to exceed the page limit for its brief in support of its exceptions to the administrative law judge's decision in the above-referenced matter due on March 16, 2009. In support of this request, Respondent states the following:

1. A 20-day hearing was held between July 9, 2007 and October 25, 2007 on the above-referenced unfair labor practice charges. The hearing included 18 days of testimony taken over five months and resulted in a 2,674-page transcript of the proceedings. In addition to the transcript, the record contains a large volume of documentary evidence, including 186 exhibits.

2. Both parties submitted lengthy post-hearing briefs on February 21, 2008. Respondent's post-hearing brief was 165 pages. The General Counsel's post-hearing brief was 159 pages.

3. On December 19, 2008, Administrative Law Judge Mindy E. Landow issued her decision in the above-referenced matter. The 88-page single-spaced opinion contains detailed factual findings, credibility determinations, legal analysis, and conclusions.

4. Section 102.46(j) of the National Labor Relations Board's Rules and Regulations states that supporting briefs shall not exceed 50 pages in length.

5. Given the voluminous record and lengthy decision issued by Administrative Law Judge Landow, Respondent will be unable to fully set out its legal arguments in support of its exceptions to the Judge's factual and legal conclusions within the 50-page limit as required by the Board. For this reason, Respondent requests that the page limit for its brief in support of its exceptions be increased to a total of 85 pages.

6. Respondent has conferred with Counsel for the General Counsel Burt Pearlstone about this motion, and the General Counsel does not oppose this request.

WHEREFORE, Respondent respectfully requests permission to exceed the page limit for its brief in support of its exceptions to the administrative law judge's decision, and to file a brief not to exceed 85 pages.

Respectfully submitted this 7th day of March, 2009.

AKIN GUMP STRAUSS HAUER & FELD, LLP

By: Daniel L. Nash
Daniel L. Nash
Stacey R. Eisenstein
1333 New Hampshire Avenue, NW
Washington, DC 20036
(202) 887-4000
(202) 887-4288 (facsimile)
Attorneys for Respondent

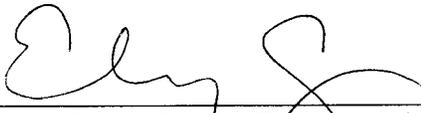
CERTIFICATE OF SERVICE

I hereby certify that on this 5th day of March, 2009, I caused a copy of the foregoing Motion to Exceed Page Limit for Brief in Support of Exceptions to Administrative Law Judge's Decision to be served, via overnight mail, on the following:

Burt Pearlstone
Audrey Eveillard
Counsel for the General Counsel
National Labor Relations Board
26 Federal Plaza, 36th Floor
New York, New York 10278

Stuart Lichten
Counsel for the Charging Party
Schwartz, Lichten & Bright
275 7th Avenue
17th Floor
New York, NY 10001

Celeste Mattina
Regional Director
National Labor Relations Board, Region 2
26 Federal Plaza, Room 3614
New York, New York 10278


Akin Gump Strauss Hauer & Feld, LLP
1333 New Hampshire Avenue, NW
Washington, DC 20036
(202) 887-4000
(202) 887-4288 (facsimile)

Attorneys for Respondent