

ATKINSON, ANDELSON, LOYA, RUUD & ROMO
A Professional Corporation
Thomas A. Lenz, Esq. - SBN 152624
tlenz@aalrr.com
17871 Park Plaza Drive
Cerritos, California 90703-8597
(562) 653-3200 - (714) 826-5480
FAX (562) 653-3333

Attorneys for Charging Party
AMES CONSTRUCTION, INC.

UNITED STATES OF AMERICA
BEFORE THE NATIONAL LABOR RELATIONS BOARD

LABORERS INTERNATIONAL UNION
OF NORTH AMERICA, LOCAL NO. 1184

and

AMES CONSTRUCTION, INC.

and

TEAMSTERS, CHAUFFERS,
WAREHOUSEMEN, INDUSTRIAL AND
ALLIED WORKERS OF AMERICA,
LOCAL 166, INTERNATIONAL
BROTHERHOOD OF TEAMSTERS

Case 21-CD-674

**JOINT MOTION FOR
EXTENSION OF TIME TO FILE
POST-HEARING BRIEFS**

To the NATIONAL LABOR RELATIONS BOARD (“NLRB”) **Executive Secretary:**

AMES CONSTRUCTION, INC., by its counsel, and LABORERS INTERNATIONAL UNION OF NORTH AMERICA, LOCAL NO. 1184 and TEAMSTERS, CHAUFFERS, WAREHOUSEMEN, INDUSTRIAL AND ALLIED WORKERS OF AMERICA, LOCAL 166, INTERNATIONAL BROTHERHOOD OF TEAMSTERS, by joinder, (collectively, hereafter the “PARTIES”) hereby respectfully move the NLRB for a thirty (30) day extension of time, from May 20, 2009 to June 16, 2009, to file Post-Hearing Briefs. In support of the motion, the PARTIES set forth the following facts:

1. On May 13, 2009, a Section 10(k) hearing was held in the above-captioned matter.
2. The Hearing Officer set the deadline to file Post-Hearing Briefs for May 20, 2009.
3. The reporter confirmed that the transcript would not be available before May 20, 2009, the PARTIES' briefing deadline.
4. There are numerous exhibits.
5. The PARTIES discussed in the hearing room, and all agreed, that an extension of time should be requested.
6. The PARTIES agreed that an extension of the briefing deadline should be requested in order to have adequate time to review and address the record evidence in briefing arguments.
7. The undersigned has a brief, to the Board on another Section 10(k) case, with a much larger record, which is due by June 11, 2009 (Case 19-CD-499).
8. Accordingly, this pleading represents the motion of the PARTIES in the hearing, to extend the briefing deadline from the current May 20, 2009 deadline to June 16, 2009.

Dated: May 14, 2009

Respectfully submitted for all parties,

By: _____

Thomas A. Lenz, Esq.
ATKINSON, ANDELSON, LOYA, RUUD
& ROMO
Attorney for AMES CONSTRUCTION, INC.

PROOF OF SERVICE

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

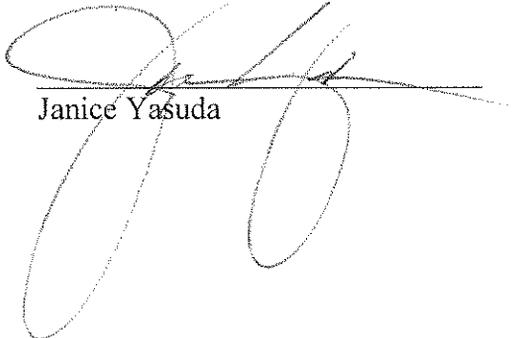
I am employed in the County of Los Angeles, State of California. I am over the age of eighteen years and not a party of the within action. My business address is 17871 Park Plaza Drive, Cerritos, CA 90703.

On May 14, 2009, I served the foregoing document described as **JOINT MOTION FOR EXTENSION OF TIME TO FILE POST-HEARING BRIEFS** on the interested parties in this action by E-File, E-mail, Facsimile and by first class postage fully prepaid at the following addresses:

See Attached List

I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

Executed on May 14, 2009, at Cerritos, California.


Janice Yasuda

<u>E-File</u>		
<p>Lester A. Heltzer, Executive Secretary NATIONAL LABOR RELATIONS BOARD 1099 - 14th St., NW, Room 11602 Washington, D.C. 20570-0001</p> <p>James Small, Regional Director NATIONAL LABOR RELATIONS BOARD 888 South Figueroa Street, Ninth Floor Los Angeles, CA 90017-5449</p>		
<u>Facsimile and Regular Mail</u>		
<p>Teamsters Local 166 P.O. Box 899 18597 Valley Boulevard Bloomington, CA 92316-0899</p>	<p>Tel: 909/877-8326 Fax: 909/877-2812</p>	
<p>Michael Dea Laborers Local 1184 1128 E. La Cadena Drive Riverside, CA 92507</p>	<p>Tel: 951/684-1484 Fax: 951/779-1445</p>	
<u>Via E-Mail</u>		
<p>Fern M. Steiner Tosdal, Smith, Steiner & Wax 401 W. A Street, Suite 320 San Diego, CA 92101-7911</p>	<p>fsteiner@tosdalsmith.com</p>	
<p>Robert M. Dohrmann, Esq. Schwartz, Steinsapir, Dohrmann & Sommers, LLP 6300 Wilshire Blvd. Suite 2000 Los Angeles CA 90048-5268</p>	<p>rmd@ssdslaw.com</p>	
Client		