

BEFORE THE NATIONAL LABOR RELATIONS BOARD

In the Matter of:

SOUTHWEST REGIONAL COUNCIL OF CARPENTERS AND  
ITS AFFILIATED LOCAL UNION 1780, AFFILIATED WITH  
UNITED BROTHERHOOD OF CARPENTERS AND JOINERS  
OF AMERICA

and

CASE NO. 28-CD-272

IMAGE EXHIBITS SERVICES, INC

and

TEAMSTERS, CHAUFFEURS, WAREHOUSEMEN AND  
HELPERS, LOCAL 631, AFFILIATED WITH  
INTERNATIONAL BROTHERHOOD OF TEAMSTERS

**MOTION FOR AN EXTENSION OF TIME TO FILE SUPPLEMENTAL BRIEF**

The Southwest Regional Council of Carpenters (“SWRCC”) and its affiliated Local Union 1780 (“Local 1780”), affiliated with the United Brotherhood of Carpenters and Joiners of America (collectively “Carpenters Union”) hereby request an extension of time to file a Supplemental Brief on the issue of work preservation. This Motion for an Extension of Time is made pursuant to NLRB Rules and Regulations Sections 102.90 and 102.111(b). The Supplemental Brief is due on **May 27, 2009**. The Carpenters Union make an unopposed extension request of an additional 14-days so that the deadline for the Supplemental Brief is up to and including **June 10, 2009**.

As grounds for this Motion for an Extension of Time, the Carpenters Union submits the following:

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1. The Board issued a Notice and Request for Supplemental Brief on May 13, 2009. In its Notice, the Board stated that “[w]e find that the facts of this case may raise an issue of work preservation. The parties, however, have not specifically addressed the issue. Accordingly, we invite the parties, within 14 days of the issuance of this Notice, to submit supplemental briefs stating their position on whether this case involves a jurisdictional dispute or a dispute over work preservation.” The Counsel for the Carpenters Union did not receive the Notice and Request for Supplemental Brief until May 18, 2009.

2. Counsel for the Carpenters Union will be out-of-state for a federal court evidentiary hearing in Arizona from May 20 to May 21, 2009.

3. The additional time is needed to prepare and file a Supplemental Brief for the reasons stated above, which are “grounded on circumstances not reasonably foreseeable in advance.” Sec. 102.111(b). The requested 14-day extension is the minimum estimated time needed to prepare and file the Supplemental Brief. No party will be prejudiced by granting this short extension of time.

4. Counsel for the Carpenters Union has contacted counsel for the opposing parties. Both James T. Winkler of Little Mendelson and Joseph J. Kaplon of Wohlner, Kaplon, Phillips, Young & Cutler consent to the 14-day extension request by the Carpenters Union.

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Therefore, for the reasons states above, the Carpenters Union respectfully requests that this Motion for an Extension of Time be granted so that the Supplemental Brief may be filed no later than **June 10, 2009**.

DATED: May 19, 2009

DeCARLO, CONNOR & SHANLEY  
A Professional Corporation



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Kathleen M. Jorgenson

Attorneys for SOUTHWEST REGIONAL  
COUNCIL OF CARPENTERS AND ITS  
AFFILIATED LOCAL UNION 1780,  
AFFILIATED WITH UNITED BROTHERHOOD  
OF CARPENTERS AND JOINERS OF AMERICA

**PROOF OF SERVICE**

**STATE OF CALIFORNIA, COUNTY OF LOS ANGELES**

I, Kathleen M. Jorgenson, declare as follows:

1. I am employed in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action; my business address is DeCARLO, CONNOR & SHANLEY, a Professional Corporation, 533 South Fremont Avenue, Ninth Floor, Los Angeles, California 90071-1706.

2. On May 19, 2009, I telephonically notified Joseph J. Kaplon, Esq., and James T. Winkler, Esq., counsel for the other parties in this matter, that Respondent Southwest Regional Council of Carpenters and its Affiliated Local Union 1780, etc., would be E-Filing the MOTION FOR AN EXTENSION OF TIME TO FILE SUPPLEMENTAL BRIEF in Case No. 28-CD-272.

3. On May 19, 2009, I served via fax Joseph J. Kaplon, Esq., and James T. Winkler, Esq., counsel for the other parties in this matter, the Motion for an Extension of Time to File Supplemental Brief in Case No. 28-CD-272, as follows:

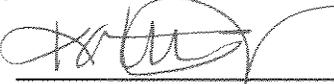
Joseph J. Kaplon, Esq.  
WOHLNER KAPLON PHILLIPS YOUNG  
& CUTLER  
Facsimile No.: 818.501.5306

James T. Winkler, Esq.  
Wesley Shelton, Esq.  
LITTLE MENDELSON  
Facsimile No.: 702.862.8811

Executed on May 19, 2009, at Los Angeles, California.

- (STATE) I declare under penalty of perjury under the laws of the State of California that the above is true and correct.
- (FEDERAL) 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.

I hereby certify that on May 19, 2009, I e-filed Motion for an Extension of Time to File Supplemental Brief in Case No. 28-CD-272.

  
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Kathleen M. Jorgenson