

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

CNN AMERICA, INC. AND TEAM VIDEO SERVICES, LLC

And

Case No. 5-CA-31828

NATIONAL ASSOCIATION OF BROADCAST EMPLOYEES  
& TECHNICIANS, COMMUNICATIONS WORKERS OF  
AMERICAN, LOCAL 31, AFL-CIO,

And

CNN AMERICA, INC. AND TEAM VIDEO SERVICES, LLC

And

Case No. 5-CA-33125  
(formerly 2-CA-36129)

NATIONAL ASSOCIATION OF BROADCAST EMPLOYEES  
& TECHNICIANS, COMMUNICATIONS WORKERS OF  
AMERICAN, LOCAL 11, AFL-CIO.

**JOINT MOTION OF THE GENERAL COUNSEL AND CNN AMERICA, INC. FOR AN  
EXTENSION OF TIME TO FILE REPLY BRIEFS AND FOR AN ENLARGEMENT OF  
THE PAGE LIMIT**

The General Counsel and CNN America, Inc. ("CNN") hereby respectfully request extensions of time in which to file, and enlargements of the page limit for, their respective reply briefs. The General Counsel has authorized the undersigned to state that it joins in this request. The General Counsel and CNN jointly request permission to file, on or before Tuesday, June 30, 2009, their respective reply briefs of no more than 50 letter-sized, double-spaced pages each. Local 31 and Local 11 have authorized the undersigned to state that they have no objections to this request. In support of their joint request, the General Counsel and CNN state as follows:

1. On Monday, May 18, 2009, CNN submitted a consolidated 100-page brief in response to the cross-exceptions of the General Counsel and the partial cross-exceptions of the charging parties. The same day, the General Counsel and Local 31 each submitted briefs

answering CNN's exceptions running 218 and 217 pages, respectively. In addition, both CNN and the General Counsel submitted appendices in support of their answering briefs. Absent this joint request, pursuant to NLRB Rules & Regulations § 102.46(h), the parties would each have 14 days to submit 10-page reply briefs.

2. As the Associate Executive Secretary observed in his March 31, 2009 Order, this is an "unusual case." The hearing took more than 80 days spread across eight months in two cities, involved more than 16,000 pages of testimony and approximately 1,300 exhibits, and produced a 150-page ALJ decision, excluding appendices. More than 1,000 exceptions and cross-exception have been filed, to which the parties have responded.

3. The General Counsel and CNN agree that 10 pages are insufficient to reply meaningfully to the arguments contain in the answering briefs—especially in light of their length, the complexity of the factual and legal issues, and voluminous record of the case. The General Counsel and CNN respectfully suggest that the nature of this case and the length and complexity of the answering briefs require reply briefs of greater length. Without objection from Local 31 an Local 11, the General Counsel and CNN jointly request permission for each to file a reply brief of no more than 50 pages on or before June 30, 2009 to conclude the briefing in this case.

Respectfully Submitted,

  
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**COUNSEL FOR RESPONDENT  
CNN AMERICA, INC.**

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

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JOINT EMPLOYERS

and

Case 5-CA-31828

NATIONAL ASSOCIATION OF BROADCAST EMPLOYEES &  
TECHNICIANS, COMMUNICATIONS WORKERS OF AMERICA,  
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TECHNICIANS, COMMUNICATIONS WORKERS OF AMERICA,  
LOCAL 11, AFL-CIO

**AFFIDAVIT OF SERVICE**

Eric Engberg, being duly sworn, deposes and says as follows:

1. I am over 18 years of age, am not a party to this proceeding, and am employed by the law firm of Paul, Hastings, Janofsky & Walker LLP, 875 15th Street, N.W., Washington, D.C. 20005.

2. On the 20th day of May, 2009, I filed, by E-file, the Joint Motion of the General Counsel and CNN America, Inc. for an Extension of Time to File Reply Briefs and for an Enlargement of the Page Limit, with Henry S. Breiteneicher, Associate Executive Secretary, National Labor Relations Board, 1099 14th Street, N.W., Washington, D.C. 20570.

3. On the 20th day of May, 2009, I served one true and correct copy of the Joint Motion of the General Counsel and CNN America, Inc. for an Extension of Time to File Reply Briefs and for an Enlargement of the Page Limit, by e- mail, on the following:

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4. On the 20th day of May, 2009, I served one true and correct copy of the Joint Motion of the General Counsel and CNN America, Inc. for an Extension of Time to File Reply Briefs and for an Enlargement of the Page Limit, by overnight delivery on the following and notified the same by telephone at the numbers below:

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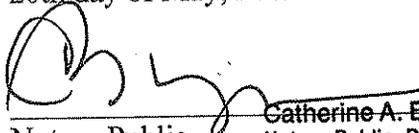
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Eric Engberg

Sworn to before me this  
20th day of May, 2009

  
Notary Public **Catherine A. Bynum**  
Notary Public, District of Columbia  
My Commission Expires 02/14/2010

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