LAW OFFICES

O'DONOGHUE & O'DONOGHUE LLP

DONALD J. CAPUANO
JAMES R. O'CONNELL (DC & MD)
ROBERT MATISOFF
JOYCE-A. MADER (DC & PA)
SALLY M. TEDROW
BRIAN A. POWERS
JOHN L. BOHMAN
FRANCIS J. MARTORANA (DC, MD & VA)
NICHOLAS R. FEMIA (DC & PA)
ELLEN O. BOARDMAN
CHARLES W. GILLIGAN (DC & MD)
LOUIS P. MALONE III
JOHN LEARY
MARY C. FELLER (DC & PA)
JOHN R. HARNEY (DC, MD & VA)
RICHARD HOPP (DC & MD)
GERARD M. WAITES (DC & PA)

4748 WISCONSIN AVENUE, NW
WASHINGTON, DC 20016
(202) 362-0041
FAX (202) 362-2640

THREE PARK PLACE
SUITE 301
ANNAPOLIS, MD 21401
(410) 263-6474

CONSTITUTION PLACE
SUITE 515
325 CHESTNUT STREET
PHILADELPHIA, PA 19106
(215) 629-4970

MARK W. KUNST (DC & MD)
ROBERT P. CURLEY (PA ONLY)
JOHN M. McINTIRE (DC & MD)
GREGORY F. MOORE (DC & MD)
DINAH S. LEVENTHAL (DC & MD)
KEITH R. BOLEK (DC & MD)
DAVID D. CAPUANO (PA ONLY)
CATHERINE R. FAYETTE
AARON D. LLOYD (DC & MD)
RENEE M. GERNI (DC & VA)
SCOTT M. SEEDORF
JASON McGAUGHY
ALIAKBAR T. ESFAHANI (DC & MD)

MARTIN F. O'DONOGHUE
(1902-1973)
PATRICK C. O'DONOGHUE
(1930-1979)
JOSEPH P. BOYLE
(1954-1998)

July 7, 2010

Via E-Filing

Mr. Henry S. Breiteneicher
Associate Executive Secretary
National Labor Relations Board
1099 14th Street, NW
Washington, D.C. 20570

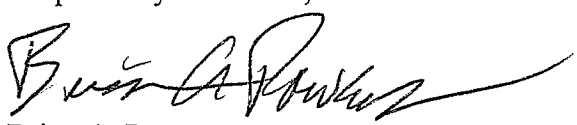
Re: CNN America, Inc. and Team Video Services, LLC,
Case Nos. 5-CA-31828 & 5-CA-33125

Dear Mr. Breiteneicher:

Counsel for the Charging Party, National Association of Broadcast Employees & Technicians, Local 31 ("NABET Local 31") respectfully submits this opposition to the request of Respondent CNN America, Inc. ("CNN") set forth in its June 28, 2010 letter. Respondent CNN asks for permission to brief the impact of the Supreme Court's decision in *New Process Steel, L.P. v. NLRB* in the above-referenced cases, and, additionally, CNN asserts the right to brief issues involving interlocutory rulings that were made during the trial in those cases.

As Counsel for the General Counsel has astutely observed, CNN has already briefed these issues in its exceptions from the decision of the Administrative Law Judge. (*See* CNN Exception III.G.120 at 327 & III.H.126 at 328.) For this reason, as well as the others set forth in Counsel for the General Counsel's July 6, 2010 letter, NABET Local 31 respectfully requests that the Board deny CNN's request to submit supplemental briefing with regard to the Court's decision in *New Process Steel.*

Respectfully submitted,



Brian A. Powers
Counsel for NABET Local 31

CERTIFICATE OF SERVICE

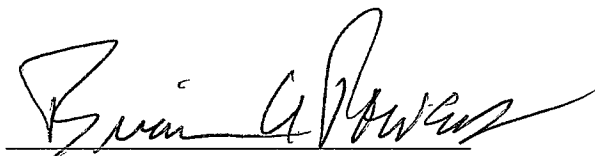
The undersigned hereby certifies that a copy of the foregoing letter to Henry S. Breiteneicher dated July 7, 2010 has been sent by e-mail to the following on July 6, 2010:

Allen Rose, Esq.
Counsel for the General Counsel
National Labor Relations Board, Region 2
(Allen.Rose@nlrb.gov)

Barry Peek, Esq.
Meyer, Suozzi, English & Klein
(bpeek@msek.com)

Peter Chatilovicz, Esq.
Seyfarth Shaw, LLP
(pchatilovicz@seyfarth.com)

Zachary Fasman, Esq.
Paul, Hastings, Janofsky & Walker, LLP
ZacharyFasman@paulhastings.com



Brian A. Powers