

**UNITED STATES OF AMERICA
BEFORE THE NATIONAL LABOR RELATIONS BOARD
Washington, D.C.**

VERITAS HEALTH SERVICES, INC.
d/b/a CHINO VALLEY MEDICAL
CENTER,

Respondent,

v.

UNITED NURSES ASSOCIATIONS OF
CALIFORNIA/UNION OF
HEALTHCARE PROFESSIONALS,
NUHHCE, AFSCME, AFL-CIO,

Charging Party.

Case No. 31-CA-29713, 31-CA-29714,
31-CA-29715; 31-CA-29716
31-CA-29717, 31-CA-29738
31-CA-29745, 31-CA-29749
31-CA-29768, 31-CA-29769,
31-CA-29786, 31-CA-29936
31-CA-29965, 31-CA-29966

**RESPONDENT VERITAS HEALTH SERVICES, INC.
d/b/a CHINO VALLEY MEDICAL CENTER' MOTION FOR PERMISSION TO
EXCEED 50 PAGE LIMIT ON BRIEF IN SUPPORT OF EXCEPTIONS TO THE
DECISION OF THE ADMINISTRATIVE LAW JUDGE**

Pursuant to Section 102.46(j) of the Board's Rules and Regulations, 29 CFR § 102.46(j), Respondent Veritas Health Services, Inc. d/b/a Chino Valley Medical Center ("Respondent") hereby requests permission to exceed the 50 page limitation on briefs filed in support of exceptions to the decision of an administrative law judge. In support hereof Respondent shows as follows:

1. The complaint in this matter includes approximately two dozen separate unfair labor practice allegations based on 14 separate unfair labor practice charges.
2. The hearing in this matter required six days of hearing. More than twenty individuals were called as witnesses and the transcript from the hearing is over one thousand pages. Exhibits totaling several thousands of pages were also admitted into the record.
3. General Counsel's post-hearing brief was 125 pages, many of which included large sections of single-spaced text. Respondent's post-hearing brief was 66 pages.

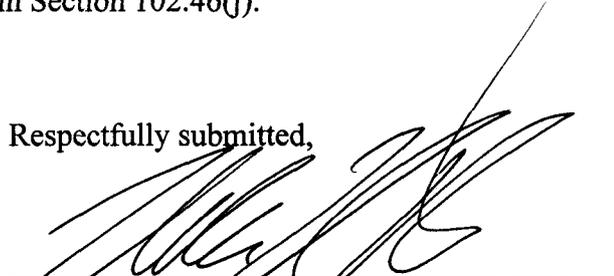
4. The ALJ's decision is 36 single-spaced pages and finds in favor of the General Counsel on virtually all unfair labor practices alleged in General Counsel's complaint. Moreover, the decision contains no discussion of large portions of the record that will be necessary for full consideration of Respondent's exceptions.

5. The undersigned anticipates that Respondent will need at least 100 pages to adequately explain the basis for its exceptions to the findings and conclusions set forth in the ALJ's decision, as well as its exceptions to numerous rulings made by the ALJ during the course of the hearing.

WHEREFORE, it is respectfully requested that permission be granted for Respondent to exceed the 50 page limit set forth in Section 102.46(j).

Dated: December 2, 2011

Respectfully submitted,



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PROOF OF SERVICE BY E-MAIL

I am employed in San Diego County, California. I am over the age of eighteen years and not a party to the within-entitled action. My business address is 501 W. Broadway, Suite 900, San Diego, California 92101.3577. On December 2, 2011, I served a true and correct copy of:

RESPONDENT VERITAS HEALTH SERVICES, INC. d/b/a CHINO VALLEY MEDICAL CENTER'S MOTION FOR PERMISSION TO EXCEED 50 PAGE LIMIT ON BRIEF IN SUPPORT OF EXCEPTIONS TO THE DECISION OF THE ADMINISTRATIVE LAW JUDGE

by e-mailing the document to the following persons at the e-mail addresses listed below:

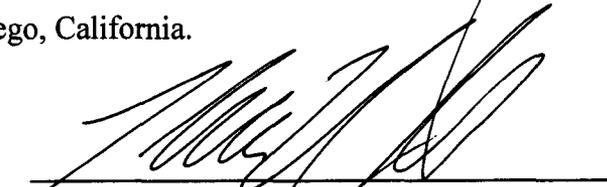
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Executed on December 2, 2011, at San Diego, California.



Theodore R. Scott