

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

In the Matter of)	
)	
1621 ROUTE 22 WEST OPERATING COMPANY, LLC D/B/A SOMERSET VALLEY REHABILITATION AND NURSING CENTER)	
)	
Respondent)	Case No. 22-CA-29599
)	22-CA-29628
)	22-CA-29868
and)	
)	
1199 SEIU UNITED HEALTHCARE WORKERS EAST, NEW JERSEY REGION)	
)	
Charging Party)	

**EMPLOYER’S MOTION TO EXCEED PAGE LIMIT FOR BRIEF IN SUPPORT OF
EXCEPTIONS TO ADMINISTRATIVE LAW JUDGE’S DECISION**

Comes now the Employer, 1621 Route 22 West Operating Company, LLC d/b/a Somerset Valley Rehabilitation and Nursing Center (hereafter “Employer”) by and through its undersigned attorneys, and pursuant to NLRB Rules and Regulations Section 102.46(j) hereby respectfully requests permission to exceed the 50-page limit for its Brief in Support of Exceptions to the Administrative Law Judge’s Decision in the above-captioned case. In support of this Motion, the Employer would show as follows:

1. On Monday, November 21, 2011 the Administrative Law Judge issued his Decision in the above-captioned case, which is 56 single-spaced pages in length and contains a detailed analysis of the facts and law.

2. The Decision by the ALJ addressed numerous alleged violations of the National Labor Relations Act by the Employer including five terminations, numerous other disciplinary actions, reductions in the hours of per diem employees, and multiple allegations of interrogation and solicitations of grievances.

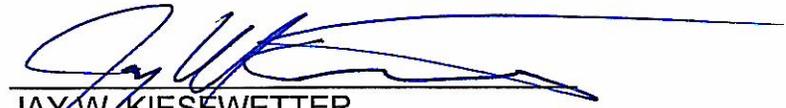
3. The Hearing in this case began on April 27, 2011, and included a total of 19 days of hearing through June 28, 2011. There were 23 witnesses who testified at the hearing, and the official hearing transcript in this case is more than 3,300 pages long.

4. Due to the complexity of this case, the significant legal and factual issues involved, the number of witnesses who testified, the length of the record, and the length of the Administrative Law Judge's Decision, the Employer respectfully requests a 50 page extension to the 50 page limit for its Brief in Support of Exceptions.

WHEREFORE, the Employer respectfully requests a 50 page extension to the 50 page limit, for a document totaling no more than 100 pages exclusive of subject index and table of cases and other authorities cited, for its Brief in Support of Exceptions in the above-captioned case.

Respectfully submitted,

KIESEWETTER WISE KAPLAN PRATHER, PLC

A handwritten signature in blue ink, appearing to be 'J.W. Kieseewetter', written over a horizontal line.

JAY W. KIESEWETTER
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Attorneys for Employer

CERTIFICATE OF SERVICE

The undersigned certifies that on the 6th day of January 2012, the foregoing pleading was filed via electronic filing with:

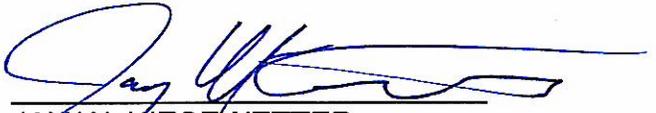
Lester A. Heltzer
Executive Secretary
National Labor Relations Board
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