



United States Government

**NATIONAL LABOR RELATIONS BOARD**  
Region 22  
20 Washington Place - 5th Floor  
Newark, NJ 07102

January 24, 2012

Lester A. Heltzer  
Executive Secretary  
National Labor Relations Board  
1099 14<sup>th</sup> Street, N.W.  
Washington, D.C. 20570

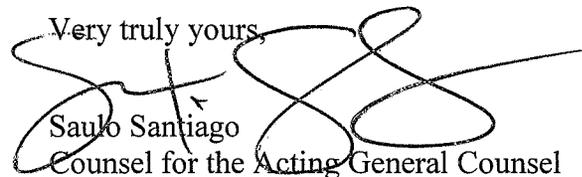
Re: Somerset Valley Rehabilitation and Nursing Center  
Cases 22-CA-29599, 29628, and 29868

Dear Mr. Heltzer:

I write to respectfully request a 30 day extension of time in which to file Acting General Counsel's Answering Brief in response to Respondent's Exceptions to the Administrative Law Judge's Decision, herein "ALJD" in connection with the above-referenced matters. Additionally, Acting General Counsel requests permission for a 75 page extension to exceed the 50 page limitation, for a document totaling no more than 125 pages exclusive of subject index and table of cases and other authorities. Acting General Counsel's Answering Brief is due on February 1, 2012; however, due to the complexity of this case, the significant legal and factual issues involved, the length of the record which amounts to 3,400 pages and over 250 exhibits and the length of the ALJD, the sheer number of Respondent's exceptions to the ALJD and the unavailability of Acting General Counsel's attorneys on January 25, 26 and 27 (if necessary) due to ongoing 10(j) litigation in front of Judge Mary L. Cooper at the New Jersey District Court in Trenton, New Jersey, Acting General Counsel respectfully requests a 30 day extension of time through and including February 29, 2012 in which to file its Answering Brief and requests to exceed the page limit for same reasons cited.

Acting General Counsel has contacted the counsel for Respondent and counsel for the Union regarding these matters, and they both agreed to Acting General Counsel's requests for an extension of time to file an answering brief and request to exceed the Board's page limit.

Very truly yours,

  
Saulo Santiago  
Counsel for the Acting General Counsel

Cc: Jay Kiesewetter (via Email)  
Ellen Dichner (via Email)