

**UNITED STATES OF AMERICA  
BEFORE THE NATIONAL LABOR RELATIONS BOARD  
REGION 15**

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**BIG MOOSE, LLC** \*  
\*  
**and** \*  
\*  
**HUMBERTO RECIO, AN INDIVIDUAL** \*  
\*  
**and** \*  
\*  
**INTERNATIONAL ALLIANCE OF** \*  
**THEATRICAL STAGE EMPLOYEES** \*  
**LOCAL 478 (THE GREEN LANTERN)** \*  
\*  
**and** \*  
\*  
**HUMBERTO RECIO, AN INDIVIDUAL** \*  
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**Case Nos. 15-CA-19735  
15-CB-5998**

**AMENDED COUNSEL FOR ACTING GENERAL COUNSEL’S MOTION  
FOR EXTENSION OF TIME TO FILE ANSWERING BRIEF  
TO RESPONDENT-UNION’S EXCEPTIONS  
TO THE ADMINISTRATIVE LAW JUDGE’S  
DECISION AND TO FILE CROSS-EXCEPTIONS**

Pursuant to Rule 102.46 of the Board’s Rules and Regulations, as amended, Counsel for the Acting General Counsel hereby requests an extension of time to file an Answering Brief to Respondent-Union’s Exceptions to the Decision and Order of the Administrative Law Judge in the above-captioned matters and to file Cross-Exceptions. The Answering Brief and Cross-Exceptions are due on March 15, 2012. Counsel for the Acting General Counsel requests a two-week extension, thereby changing the due date to March 29, 2012. The extensive nature of Respondent-Union’s Exceptions and Counsel for the Acting General Counsel’s previously scheduled out-of-town work makes it

impossible to properly respond to Respondent-Union's Exceptions and to file Cross-Exceptions by March 15, 2012, which therefore necessitates an extension.

Counsel for the Acting General Counsel has contacted the Charging Party, Counsel for Respondent-Union, and Counsel for Respondent-Employer regarding this motion. Counsel for Respondent-Union and Counsel for Respondent-Employer<sup>1</sup> have no objection to this motion. The Charging Party has yet to respond to Counsel for the Acting General Counsel's motion.

Dated: March 9, 2012

Respectfully submitted,

/s/Zachary E. Herlands/s/

Zachary E. Herlands  
Counsel for the Acting General Counsel  
National Labor Relations Board  
Region 15  
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<sup>1</sup> Respondent-Employer has not filed Exceptions in this matter.

**CERTIFICATE OF SERVICE**

A copy of the foregoing Counsel for Acting General Counsel's Motion for Extension of Time to File Answering Brief to Respondent-Union's Exceptions to the Administrative Law Judge's Decision and to File Cross-Exceptions has been sent to the following parties via electronic mail on March 9, 2012:

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