

UNITED STATES OF AMERICA  
BEFORE THE NATIONAL LABOR RELATIONS BOARD  
REGION 11

GREDE II, LLC

and

UNITED STEEL, PAPER AND FORESTRY, RUBBER,  
MANUFACTURING, ENERGY, ALLIED INDUSTRIAL  
AND SERVICE WORKERS INTERNATIONAL  
UNION, AFL-CIO, CLC

Cases 11-CA-22980  
11-CA-22984  
11-CA-22997  
11-CA-66972

GREDE II, LLC

Employer

and

UNITED STEEL, PAPER AND FORESTRY, RUBBER,  
MANUFACTURING, ENERGY, ALLIED INDUSTRIAL  
AND SERVICE WORKERS INTERNATIONAL  
UNION, AFL-CIO, CLC

Case 11-RC-6748

Petitioner

To the Honorable, the Members of the  
National Labor Relations Board  
1099 14<sup>th</sup> Street, N.W.  
Washington, DC 20570

**GREDE II LLC'S RESPONSE IN OPPOSITION TO MOTION FOR  
EXTENSION OF TIME TO FILE EXCEPTIONS**

Respondent Grede II, LLC ("Grede") opposes the request of Counsel for the Acting  
General Counsel for an extension of time to file exceptions to the decision of the Administrative  
Law Judge in the above-captioned matters for the following reasons:

1. The requested extension is not necessary. While Ms. Meares grieves the loss of her grandmother, the other attorney that represented Acting General Counsel at the hearing should be able to prepare the exceptions in her absence. That attorney, Jasper Brown, is a highly experienced attorney and is well versed in the facts and arguments in the case. In any event, a four and a half week extension is an excessive request if Ms. Meares is expected to miss one and a half weeks of work.
2. Grede is prejudiced by the requested extension. The Administrative Law Judge's decision in this matter requires Grede to pay hundreds of thousands of dollars in a retroactive wage increase and a retroactive bonus – all subject to daily compounding interest. Grede estimates that the requested extension will add more than \$1,000 in daily compounding interest.
3. If any extension of time is granted, the incurring and compounding of interest should be tolled during the extension.

The requested extension is unnecessary, excessive, and prejudicial. It should be denied.

Respectfully submitted,

BODMAN PLC

By: /s/ John C. Cashen  
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Attorneys for Grede II, LLC

Dated: April 30, 2012

## CERTIFICATE OF SERVICE

John C. Cashen certifies that the foregoing Response in Opposition to Extension of Time to File Exceptions was efiled with the National Labor Relations Board Office of Executive Secretary and was served on the National Labor Relations Board, Acting General Counsel, care of Lisa R. Shearin, to [Lisa.shearin@nlrb.gov](mailto:Lisa.shearin@nlrb.gov), and Shannon R. Meares, to [Shannon.meares@nlrb.gov](mailto:Shannon.meares@nlrb.gov) by email and upon Brad Manzolillo, Esq., Counsel for the United Steel, Paper and Forestry, Rubber, Manufacturing, Energy, Allied Industrial and Service Workers International Union, AFL-CIO, CLC, Five Gateway Center, Room 913, Pittsburgh, PA 15222, email: [bmanzolillo@usw.org](mailto:bmanzolillo@usw.org) on April 30, 2012.

/s/ John C. Cashen  
John C. Cashen

April 30, 2012