BEFORE THE
NATIONAL LABOR RELATIONS BOARD

DUQUESNE UNIVERSITY, OF THE HOLY SPIRIT	)	**Case No. 06-RC-080933**
Employer,	)	
v.	)	
UNITED STEEL, PAPER AND FORESTRY, RUBBER, MANUFACTURING, ENERGY, ALLIED INDUSTRIAL AND SERVICE WORKERS INTERNATIONAL UNION, AFL-CIO, CLC,	)	
Petitioner.	)	

REQUEST FOR SPECIAL PERMISSION TO FILE BRIEF *AMICUS CURIAE*

The Association of Catholic Colleges and Universities ("ACCU") respectfully requests permission to file a brief *amicus curiae* in the above-captioned matter. This request is substantially related to the July 6, 2012 Request for Special Permission to File Brief *Amicus Curiae* submitted by the ACCU, which the Board granted in connection with the its prior consideration of the above-captioned matter.

As detailed in the attached Statement of Interest, the ACCU has a significant interest in the Board's jurisdictional tests as they are applied to religious-affiliated education institutions in the United States and in the related constitutional issues. If granted leave to file, *amicus* would

contribute to the Board's understanding of the important First Amendment and other issues raised by Duquesne University in this case. *Amicus* respectfully submits that its brief would assist the Board by providing context for the Board's jurisdictional inquiry both substantively and procedurally as well as by situating Duquesne University's Catholic identity within the landscape of Catholic higher education. Finally, the issues raised in this matter are of great significance to the members of the ACCU.

Dated: October 4, 2012

Respectfully Submitted,

s/ Elizabeth Meers

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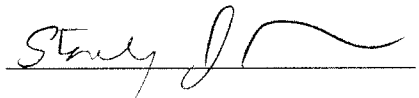

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of this document is being served this day upon the following persons, by e-mail, at the addresses below:

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The undersigned further certifies that a true and correct copy of this document is being served this day upon the following person by facsimile:

Hon. Lafe Solomon
Acting General Counsel
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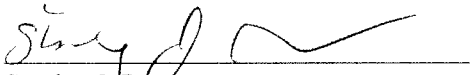
Dated this 4th day of October, 2012



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