

**GLADSTEIN, REIF & MEGINNISS, LLP**  
ATTORNEYS AT LAW

AMY GLADSTEIN  
JAMES REIF  
WALTER M. MEGINNISS, JR.  
ELLEN DICHNER  
BETH M. MARGOLIS  
WILLIAM S. MASSEY \*

817 BROADWAY • 6TH FLOOR  
NEW YORK, NEW YORK 10003  
(212) 228-7727  
FAX: (212) 228-7654



ROBERT MOLOFSKY  
*Of Counsel*

ALSO ADMITTED IN  
WASHINGTON, D.C.

AMELIA K. TUMINARO  
JANE CHUNG  
KATHERINE H. HANSEN \*

\* ALSO ADMITTED IN NJ

January 23, 2013

Gary W. Shinnars, Deputy Executive Secretary  
National Labor Relations Board  
1099 14th St. N.W.  
Washington, D.C. 20570-0001

Re: 1621 Route 22 West Operating Company, LLC  
d/b/a Somerset Valley Rehabilitation and Nursing Center  
Case No. 22-CA-069152

Dear Mr. Shinnars:

This firm represents charging party, 1199 SEIU United Healthcare Workers East, in the above-referenced matter. Please accept this letter as charging party's opposition to Respondent's motion for a 28 day extension of time to file its exceptions to the decision of the administrative law judge.

Charging party opposes this extension request because the unfair labor practices at issue are so pressing that the NLRB petitioned the federal district court for Section 10(j) relief. Further, the hearing and record in this proceeding were not lengthy. Although the hearing took place over a four day period, three of those days were half days. In its motion papers, Respondent cites to an unrelated case where the NLRB granted a 28 day extension. However, the hearing in that case lasted nine days with a transcript almost three times as long than the transcript in the instant case.

Charging party respectfully requests that the Board deny Respondent's motion for a 28 day extension.

Very truly yours,

  
Ellen Dichner (TC)

cc: Steven Likens, Esq.  
Amber Isom-Thompson, Esq.  
Nancy Slahetka, Esq.