



United States Government

NATIONAL LABOR RELATIONS BOARD

Region 2

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October 5, 2012

By E-filing

Lester A. Heltzer, Executive Secretary
Office of the Executive Secretary
National Labor Relations Board
1099 14th Street, NW
Washington DC 20570

Re: AM Property Holding Corp., and Planned Building Services
Case Nos. 2-CA-33146, *et al.*

Dear Mr. Heltzer:

The parties' Statements of Positions following the Board's acceptance of the remand from the Second Circuit Court of Appeals are currently due on October 19, 2012. As Counsel for Planned Building Services has previously informed your office, the parties desire to settle this matter and thereby obviate the need to submit statements to the Board. I am writing to request an extension of time to file the Statements of Position from October 19 to January 18, 2013. The requested extension of time is warranted to allow the Regional Office additional time to complete the vast and complex compliance investigation, which has been additionally complicated by the Region's inability to locate a number of the affected employees to obtain their relevant back pay information. The requested time is further warranted to allow the parties adequate time to review the Region's calculations and to negotiate and finalize an agreement.

General Counsel has conferred with the parties' Counsels on this request. Counsel for Local 32BJ SEIU and Planned Building Services join in the General Counsel's request. Counsel for AM Property, Servco and United Workers of America have not taken a position on the request.

Thank you for your consideration of the General Counsel's request.

Very truly yours,

Olga C. Torres
Counsel for the Acting General Counsel

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cc:

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