

**STATE OF ILLINOIS  
ILLINOIS LABOR RELATIONS BOARD  
STATE PANEL**

**INTERNATIONAL UNION OF  
OPERATING ENGINEERS, LOCAL 150,**

**Complainant,**

**and**

**CITY OF PARK RIDGE,**

**Respondent.**

**Case No. S-CA-13-197**

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**CITY OF PARK RIDGE,**

**Complainant,**

**and**

**INTERNATIONAL UNION OF  
OPERATING ENGINEERS, LOCAL 150,**

**Respondent.**

**Case No. S-CB-13-047**

**MOTION FOR EXTENSION OF DEADLINE FOR  
EXCEPTIONS TO ADMINISTRATIVE LAW JUDGE'S  
RECOMMENDED DECISION AND ORDER**

Respondent, City of Park Ridge, respectfully moves the Board's General Counsel for an extension to April 22, 2015, for the parties to file exceptions to the Administrative Law Judge's Recommended Decision and Order in the above-captioned matters. In support of its Motion, Respondent states as follows:

1. On February 27, 2015, ALJ Anna Hamburg-Gal issued her Recommended Decision and Order in the above-captioned matters.
2. The Respondent was served with a copy of the aforementioned Recommended Decision on March 2, 2015.

3. Pursuant to the Board's Rules and Regulations, the parties have 30 days in which to file exceptions to the Recommended Decision and Order. *See* 80 Ill. Admin. Code § 1200.135(b)(1). For the City, that deadline is Wednesday, April 1, 2015.

4. In order to make a decision as to whether or not to proceed with exceptions, the City's labor counsel must obtain direction from the City Council.

5. Obtaining such direction from the City Council has been delayed by the recent untimely death of the City's Mayor, David Schmidt, on the evening of March 4, 2015. The City Council just recently had an opportunity to appoint an Acting Mayor on the evening of March 16, 2015.

6. In light of the Mayor's death and competing agenda items that the City Council must address, the earliest the undersigned anticipates meeting with the City Council is Wednesday April 8, 2015, which is the next regularly scheduled full City Council meeting (other meetings are scheduled in the interim which are intended to address other specific areas of City governance). On April 8, 2015, the undersigned anticipates summarizing the City's options regarding the ALJ's Recommended Decision and Order, and receiving direction whether or not the City wishes to file exceptions.

7. In addition, the undersigned has several competing legal obligations that would make it difficult to file exceptions by April 1, 2015 (assuming *arguendo* he had the authority to do so). Among other things, the undersigned is responsible for drafting a state court motion for summary judgment and supporting memorandum of law that is due to be filed in Cook County Court by March 31, 2015, and a position statement that is due with the Illinois Educational Labor Relations Board on March 30, 2015.

8. The Respondent therefore respectfully requests an extension of three weeks for both parties to file exceptions (if any), up through and including April 22, 2015. This due date is only two weeks beyond the date that the undersigned plans to brief the City Council about its options.

9. The undersigned counsel contacted Local 150's counsel by telephone on Tuesday, March 17, 2015, to determine whether Local 150 would object to a three-week extension (from April 1, 2015) for the filing of exceptions, up through and including April 22, 2015. On March 19, 2015, counsel for Local 150 indicated in an email that the Union was not amenable to such an extension. *See Exhibit A attached hereto.*

10. The Respondent is making this Motion in good faith and for good cause. Granting this Motion will not cause an undue delay in the proceeding and will not unfairly prejudice either party.

WHEREFORE, Respondent requests an extension of time until April 22, 2015, for both parties to file exceptions to the ALJ's Recommended Decision and Order in the above-captioned matters.

Respectfully submitted,

**CITY OF PARK RIDGE**

By:   
One of its Attorneys

James J. Powers  
CLARK BAIRD SMITH LLP  
6133 North River Road  
Suite 1120  
Rosemont, Illinois 60018  
(847) 378-7700

March 19, 2015  
{00266680.DOCX v. 1 }

**James J. Powers**

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**From:** Ken Edwards <KEdwards@local150.org>  
**Sent:** Thursday, March 19, 2015 9:13 AM  
**To:** James J. Powers  
**Subject:** Request for Extension

Jim – As promised I discussed the City’s request for an extension to file exceptions to the ALJ’s decision in the recent case between the parties. My client is not amendable to such an extension at this time. Ken

Kenneth E. Edwards, Esq.  
International Union of Operating Engineers, Local 150  
6200 Joliet Road Countryside, Illinois 60525  
Tel: (708) 482-8800 x 4146  
Fax:(708) 387-8330

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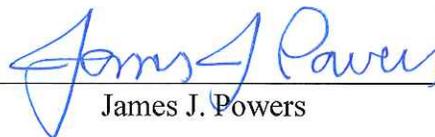


**CERTIFICATE OF SERVICE**

The undersigned attorney hereby certifies that he caused a true and correct copy of the foregoing Motion to be served upon the following party:

Kenneth Edwards  
IUOE Local 150  
6200 Joliet Road  
Countryside, IL 60525

by electronic mail and depositing the same in the U.S. Mail on this 19th day of March, 2015.

  
James J. Powers

**STATE OF ILLINOIS  
ILLINOIS LABOR RELATIONS BOARD  
STATE PANEL**

International Union of Operating	)	
Engineers, Local 150,	)	
	)	
Charging Party	)	
	)	
and	)	Case No. S-CA-13-197
	)	
City of Park Ridge,	)	
	)	
Respondent	)	

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City of Park Ridge,	)	
	)	
Charging Party	)	
	)	
and	)	Case No. S-CB-13-047
	)	
International Union of Operating	)	
Engineers, Local 150,	)	
	)	
Respondent	)	

**ORDER**

By motion received March 19, 2015, the City of Park Ridge requests a 14-day extension of time within which to file exceptions to the Administrative Law Judge's Recommended Decision and Order issued in the above-captioned matters so that its counsel will have sufficient time to confer with the City Council after the recent death of the City's Mayor. Counsel for the City advises that the International Union of Operating Engineers, Local 150, opposes the motion.

The request for an extension of time is allowed, and any exceptions to the Recommended Decision and Order are now due to be filed on or before April 22, 2015.

**Issued in Chicago, Illinois, this 19th day of March, 2015.**

**ILLINOIS LABOR RELATIONS BOARD  
STATE PANEL**

  
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**Jerald S. Post  
General Counsel**

**STATE OF ILLINOIS  
ILLINOIS LABOR RELATIONS BOARD  
STATE PANEL**

City of Park Ridge,

Employer

and

International Union of Operating  
Engineers, Local 150,

Labor Organization

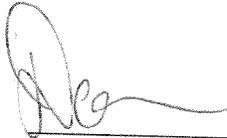
Case Nos. S-CA-13-197  
S-CB-13-047

**AFFIDAVIT OF SERVICE**

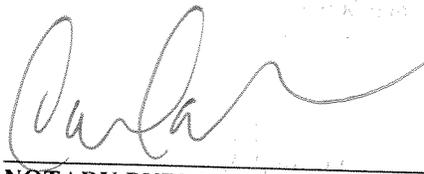
I, Deena Sanceda, on oath state that I have this 19th day of March, 2015, served the attached **ORDER OF THE ILLINOIS LABOR RELATIONS BOARD** issued in the above-captioned case on each of the parties listed herein below by depositing, before 5:00 p.m., copies thereof in the United States mail at 100 W Randolph Street, Chicago, Illinois, addressed as indicated and with postage prepaid for first class mail.

James Powers  
Clark Baird Smith, LLC  
6133 N. River Road, Suite 1120  
Rosemont, Illinois 60018

Kenneth Edwards  
IUOE, Local 150  
6200 Joliet Road  
Countryside, Illinois 60525



**SUBSCRIBED and SWORN to**  
before me this 19th day  
of March, 2015.



**NOTARY PUBLIC**

