

UNITED STATES OF AMERICA
NATIONAL LABOR RELATIONS BOARD

PACIFIC LUTHERAN UNIVERSITY,)
)
)
 Employer,)
)
 and) Case No. 19–RC–102521
)
 SERVICE EMPLOYEES INTERNATIONAL)
 UNION, LOCAL 925,)
)
 Petitioner.)
)

MOTION FOR SPECIAL LEAVE TO FILE SUPPLEMENTAL BRIEF

In *Reliant Energy*, 339 NLRB 66 (2003), the National Labor Relations Board ruled that it would essentially adopt Federal Rule of Civil Procedure 28(j) for the routine procedure of bringing to its attention supplemental authority. In the same decision, the Board stated that in appropriate situations it would grant special leave for the filing of supplemental briefs. *Id.*

Amicus Curiae, National Right to Work Legal Defense and Education Foundation, Inc., requests special leave to file the accompanying short supplemental brief describing the application of *Burwell v. Hobby Lobby, Inc.*, 134 S. Ct. 2751 (2014) to the instant case. *Hobby Lobby*, decided by the Supreme Court of the United States after all briefs were filed in this matter, is extremely significant to the constitutional issues already briefed, for it provides an expanded statutory basis to the constitutional arguments. The attached supplemental brief explains the application of this new decision to this case. *Amicus* suggests that the Board grant special leave for all parties and *amici* to file supplemental briefs regarding the application of *Hobby Lobby*.

Respectively submitted,

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