

**UNITED STATES COURT OF APPEALS
FOR THE FIFTH CIRCUIT**

| | | |
|--------------------------------|---|--------------|
| RGIS, LLC, |) | |
| |) | |
| Petitioner/Cross-Respondent |) | |
| |) | No. 16-60129 |
| v. |) | |
| |) | |
| NATIONAL LABOR RELATIONS BOARD |) | |
| |) | |
| Respondent/Cross-Petitioner |) | |

**UNOPPOSED MOTION OF PETITIONER/CROSS-RESPONDENT
RGIS, LLC FOR EXTENSION OF TIME TO FILE BRIEF**

RGIS, LLC (“RGIS” or “Petitioner”), by counsel, respectfully moves this Court for a twenty-eight (28) day extension of time, to and including June 21, 2016, to file and serve its opening brief. In support, RGIS states:

1. RGIS filed its Petition for Review on March 3, 2016.
2. The National Labor Relations Board filed its Cross-Application for Enforcement on April 15, 2016.
3. On April 14, 2016, the Court noticed the briefing schedule in this matter. Petitioner’s Brief is currently due May 24, 2016.
4. Due to Petitioner’s counsels’ prior commitments in other pending matters, Petition respectfully requests additional time to prepare and file its opening brief. Petitioner respectfully moves the Court to extend the deadline for filing and

serving its opening brief by twenty-eight (28) days, to and including June 21, 2016. Petitioner requests this extension so that it has adequate time to fully brief the issues on appeal and not for purposes of delay.

5. Petitioner has not previously requested any briefing extensions in this matter and counsel for the NLRB has represented to Petitioner that it does not oppose this requested extension.

WHEREFORE, Petitioner respectfully requests that this Court extend the deadline for Petitioner to file its opening brief by twenty-eight (28) days, to and including June 21, 2016, and for such other relief to which it may be entitled.

Dated: May 20, 2016

Respectfully submitted,

s/ Christopher C. Murray

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Attorneys for RGIS

CERTIFICATE OF SERVICE

I certify that on this 20th day of May, 2016, I caused this UNOPPOSED MOTION OF PETITIONER/CROSS-RESPONDENT RGIS, LLC FOR EXTENSION OF TIME TO FILE BRIEF to be filed electronically with the Clerk of the Court using the CM/ECF System, which will send notice of such filing to all registered CM/ECF users.

s/Christopher C. Murray

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