

Nos. 14-1232 and 14-1303

**UNITED STATES COURT OF APPEALS
FOR THE DISTRICT OF COLUMBIA CIRCUIT**

**DESIGN TECHNOLOGY GROUP, LLC d/b/a BETTIE PAGE CLOTHING and DTG
CALIFORNIA MANAGEMENT LLC, d/b/a BETTIE PAGE CLOTHING**

Petitioners/Cross-Respondents

v.

NATIONAL LABOR RELATIONS BOARD

Respondent/Cross-Petitioner

and

VANESSA MORRIS

Intervenor

**ON PETITION FOR REVIEW AND CROSS-APPLICATION FOR
ENFORCEMENT OF AN ORDER OF
THE NATIONAL LABOR RELATIONS BOARD**

**SUPPLEMENTAL BRIEF FOR
THE NATIONAL LABOR RELATIONS BOARD**

RUTH E. BURDICK
Deputy Assistant General Counsel

KELLIE ISBELL
Attorney

National Labor Relations Board
1099 14th Street, N.W.
Washington, D.C. 20570
(202) 273-7958
(202) 273-2482

RICHARD F. GRIFFIN, JR.

General Counsel

JENNIFER ABRUZZO

Deputy General Counsel

JOHN H. FERGUSON

Associate General Counsel

LINDA DREEBEN

Deputy Associate General Counsel

National Labor Relations Board

TABLE OF AUTHORITIES

Cases	Page(s)
<i>*Golden State Bottling Co. v. NLRB</i> , 414 U.S. 168 (1973).....	2
<i>NLRB v. 15th Avenue Iron Works, Inc.</i> , 964 F.2d 1336 (2d Cir. 1992).....	4
<i>NLRB v. Burns Sec. Servs.</i> , 406 U.S. 272 (1972).....	2
<i>*NLRB v. Continental Hagen Corp.</i> , 932 F.2d 828 (9th Cir. 1991).....	3, 4
<i>*NLRB v. Edward Cooper Painting</i> , 804 F.2d 934 (6th Cir. 1986).....	4
<i>NLRB v. P*I*E Nationwide, Inc.</i> , 923 F.2d 506 (7th Cir. 1991).....	4, 5
<i>NLRB v. Twin Cities Elec.</i> , 907 F.2d 108 (9th Cir. 1990).....	4
<i>Penn Terra Ltd. v. Dept. of Env'tl. Resources</i> , 733 F.2d 267 (3d Cir. 1984).....	5
 Statutes	
Bankruptcy Code, 11 U.S.C. 101 et seq	
Section 362 (11 U.S.C. § 362)	3, 4
National Labor Relations Act, as amended, 29 U.S.C. § 151 et seq.	
Section 10(e) (29 U.S.C. § 160(e))	4

* Authorities upon which we chiefly rely are marked with asterisks.

SUPPLEMENTAL BRIEF FOR THE NATIONAL LABOR RELATIONS BOARD

The Board submits this supplemental brief in response to the Court's February 23, 2017 Order, which asked the parties to address "whether these cases are now moot in whole or in part in light of petitioners' representation that they are no longer doing business and have no current operations." As detailed below, contrary to Petitioners' representation, Design Technology Group, LLC continues to operate its business. And as further shown, the Court may enter a judgment in favor of the Board, including the backpay provisions of the Board's Order, despite the personal bankruptcy of Petitioners' owner, Jan Glaser.

The Board's Order, issued on October 31, 2014, and reported at 361 NLRB No. 79, 2014 WL 5524147, found that Design Technology Group, LLC, and DTG California Management, LLC, constituted a single employer and violated the National Labor Relations Act by discharging three clothing store employees for engaging in protected, concerted activity and by maintaining an unlawful wage and salary disclosure rule in its employee handbook. The Board ordered the Petitioners to offer the three discharged employees reinstatement and backpay, to revise or rescind the unlawful rule, and post remedial notices at the San Francisco store and at other store locations where the employee handbook containing the unlawful rule was distributed.

Contrary to Petitioners' representations in their February 17, 2017 Motion to Submit the Case Without Re-Argument that they "are no longer doing business and have no current operations" (pp. 2-3), Design Technology has a current business license in Nevada. On February 27, 2017, Design Technology renewed its license and filed the required annual list of officers. *See* Attachment 1. In addition, Design Technology Group continues to operate an e-commerce site (Tatyana.com) and two retail stores in Nevada. *See* <http://www.tatyana.com/store-listings> (last visited Feb. 27, 2017), and <https://www.facebook.com/tatyanaboutique> (last visited Feb. 27, 2017). Given that the Petitioners have not filed for protection in bankruptcy, their liability under the Board's Order still must be established through normal Board compliance and collection procedures that will follow after enforcement. Further, the entirety of the Board's Order runs not only against Petitioners, but also against their "successors and assigns." 2014 WL 5524147, at *1. Thus, after the Board's Order is enforced, the Board's Regional Office will investigate whether both Design Technology Group, LLC and DTG California Management, LLC are still operating, and if they are not, whether another company is a legal successor required to assume Petitioners' obligations under the Board's Order. *See generally Golden State Bottling Co. v. NLRB*, 414 U.S. 168, 184-87 (1973) (successor unfair labor practice liability); *NLRB v. Burns Sec. Servs.*, 406 U.S. 272, 277-81 (1972) (successor bargaining obligation). *See also*

Attachment 2 (listing other businesses for which Jan Glaser serves as an officer).

Thus, the mere possibility that one of the Petitioners may not be operating, and that the Board, in a subsequent compliance proceeding, may determine that it may not be possible for one or both Petitioners to pay backpay to the unlawfully discharged employees, is not a basis for delaying the instant proceeding or denying enforcement of the Board's Order in full. Moreover, as indicated in the Petitioners' Motion (p. 3), owner Jan Glaser filed for *personal* bankruptcy. The Petitioners—who are liable under the Board's Order—have not filed for bankruptcy. While Glaser listed the Board as one of his creditors in the bankruptcy proceeding, the listing is inaccurate. Petitioners owe the debt to the Board, not Mr. Glaser in his personal capacity.

In any event, it is well settled that Board unfair labor practice proceedings are excepted from the automatic stay under Section 362 of the Bankruptcy Code, 11 U.S.C. § 362. *See NLRB v. Continental Hagen Corp.*, 932 F.2d 828, 832-33 (9th Cir. 1991). While some courts have observed that a governmental unit, under Section 362, may not enforce a money judgment against the debtor, it remains clear that the Board is not precluded from petitioning an appellate court to enforce a backpay provision in a final Board order by an entry of judgment. *See id.* at 834-35 (although “actual enforcement of a backpay provision must take place through the Bankruptcy Court,” appellate court permitted “to enforce the NLRB backpay

provision by an entry of judgment”). *See also NLRB v. Edward Cooper Painting*, 804 F.2d 934, 943 (6th Cir. 1986) (the prohibited “enforcement of a money judgment” is “when having obtained a judgment for a sum certain, a plaintiff attempts to seize property of the defendant in order to satisfy that judgment. It is this seizure of . . . property, to satisfy the judgment obtained . . . which is proscribed”); *NLRB v. 15th Avenue Iron Works, Inc.*, 964 F.2d 1336, 1337 (2d Cir. 1992) (allowing entry of a money judgment against employer, but noting that the collection of that judgment after entry requires a separate application to the bankruptcy court).

Even if the Petitioners themselves had filed for bankruptcy, that filing would only affect the means by which the Board may collect a monetary remedy from the Petitioners. It would not preclude the Board from either petitioning an appellate court to enforce a backpay provision under Section 10(e) of the NLRA, or from liquidating the backpay amount in a subsequent compliance proceeding.¹ *See Continental Hagen*, 932 F.2d at 834, 835 (§362(b) permits enforcement of the NLRB backpay order by an entry of judgment; “mere *entry* of a money judgment

¹ The Board is exempt from the automatic stay regardless of whether the debtor seeks relief under Chapter 7 or 11 of the Bankruptcy Code. *See e.g., Edward Cooper Painting*, 804 F.2d at 937, 942 (Chapter 11 corporation liquidation); *NLRB v. Twin Cities Elec.*, 907 F.2d 108 (9th Cir. 1990) (Chapter 7); *NLRB v. P*I*E Nationwide, Inc.*, 923 F.2d 506, 506 (7th Cir. 1991) (Chapter 11 reorganization); *Continental Hagen Corp.*, 932 F.2d at 832 (Chapter 11).

by a governmental unit is not affected by the automatic stay” (quoting *Penn Terra Ltd. v. Dept. of Env'tl. Resources*, 733 F.2d 267, 275 (3d Cir. 1984)) (emphasis in original); *NLRB v. P*I*E Nationwide, Inc.*, 923 F.2d 506, 512 (7th Cir. 1991) (Board does not run afoul of the Code if it is “merely seeking entry of judgment” and is not trying to seize property “to satisfy a money judgment”).

Glaser’s personal bankruptcy filing therefore does not prevent the Court from enforcing the Board’s Order in full. Accordingly, the Board respectfully submits that this proceeding is not moot, in whole or in part, and requests that the Court deny the petition for review and enforce the Board’s Order in full.

RICHARD F. GRIFFIN, JR.
General Counsel

/s/ Ruth E. Burdick
RUTH E. BURDICK
Deputy Assistant General Counsel

JENNIFER ABRUZZO
Deputy General Counsel

/s/ Kellie Isbell
KELLIE ISBELL
Attorney

JOHN H. FERGUSON
Associate General Counsel

National Labor Relations Board
1015 Half Street, SE
Washington, DC 20570
(202) 273-7958
(202) 273-2482

LINDA DREEBEN
Deputy Associate General Counsel

March 2017

Attachment 1

DESIGN TECHNOLOGY GROUP, LLC

Business Entity Information

Status:	Active	File Date:	2/25/2003
Type:	Domestic Limited-Liability Company	Entity Number:	LLC2658-2003
Qualifying State:	NV	List of Officers Due:	2/28/2018
Managed By:	Managers	Expiration Date:	2/25/2503
NV Business ID:	NV20031028435	Business License Exp:	2/28/2018

Additional Information

Central Index Key:	
--------------------	--

Registered Agent Information

Name:	JAN GLASER	Address 1:	980 AMERICA PACIFIC DR., #100
Address 2:		City:	HENDERSON
State:	NV	Zip Code:	89014
Phone:		Fax:	
Mailing Address 1:		Mailing Address 2:	
Mailing City:		Mailing State:	
Mailing Zip Code:			
Agent Type:	Noncommercial Registered Agent		

Financial Information

No Par Share Count:	0	Capital Amount:	\$ 0
No stock records found for this company			

Officers

 Include Inactive Officers

Manager - JAN GLASER

Address 1:	980 AMERICAN PACIFIC DR. STE 100	Address 2:	
City:	HENDERSON	State:	NV
Zip Code:	89014	Country:	USA
Status:	Active	Email:	

Manager - TATYANA KHOMYAKOVA

Address 1:	980 AMERICAN PACIFIC DR. STE 100	Address 2:	
City:	HENDERSON	State:	NV
Zip Code:	89014	Country:	USA
Status:	Active	Email:	

Actions\Amendments

Action Type:	Articles of Organization		
Document Number:	LLC2658-2003-001	# of Pages:	1
File Date:	2/25/2003	Effective Date:	
(No notes for this action)			
Action Type:	Initial List		
Document Number:	LLC2658-2003-003	# of Pages:	2
File Date:	6/3/2003	Effective Date:	
(No notes for this action)			
Action Type:	Annual List		
Document Number:	LLC2658-2003-002	# of Pages:	1
File Date:	4/28/2004	Effective Date:	
List of Officers for 2004 to 2005			
Action Type:	Annual List		
Document Number:	20050003276-05	# of Pages:	1
File Date:	2/10/2005	Effective Date:	
(No notes for this action)			
Action Type:	Annual List		
Document Number:	20060080624-68	# of Pages:	1
File Date:	2/8/2006	Effective Date:	
(No notes for this action)			
Action Type:	Amended List		
Document Number:	20060387482-40	# of Pages:	1
File Date:	6/16/2006	Effective Date:	
(No notes for this action)			
Action Type:	Annual List		
Document Number:	20070192808-77	# of Pages:	1
File Date:	3/20/2007	Effective Date:	
(No notes for this action)			
Action Type:	Registered Agent Change		
Document Number:	20070207248-22	# of Pages:	1
File Date:	3/22/2007	Effective Date:	
(No notes for this action)			
Action Type:	Registered Agent Change		
Document Number:	20070787776-91	# of Pages:	1
File Date:	11/16/2007	Effective Date:	
(No notes for this action)			
Action Type:	Annual List		
Document Number:	20080288777-49	# of Pages:	1
File Date:	4/25/2008	Effective Date:	
08-09			
Action Type:	Amended List		

Document Number:	20080353915-16	# of Pages:	1
File Date:	5/26/2008	Effective Date:	
(No notes for this action)			
Action Type:	Amended List		
Document Number:	20080643047-54	# of Pages:	1
File Date:	9/29/2008	Effective Date:	
(No notes for this action)			
Action Type:	Annual List		
Document Number:	20090181683-78	# of Pages:	1
File Date:	2/26/2009	Effective Date:	
(No notes for this action)			
Action Type:	Annual List		
Document Number:	20090892725-54	# of Pages:	1
File Date:	12/29/2009	Effective Date:	
(No notes for this action)			
Action Type:	Registered Agent Change		
Document Number:	20100306577-71	# of Pages:	1
File Date:	4/19/2010	Effective Date:	
(No notes for this action)			
Action Type:	Amended List		
Document Number:	20100851917-44	# of Pages:	1
File Date:	11/13/2010	Effective Date:	
(No notes for this action)			
Action Type:	Annual List		
Document Number:	20110126013-67	# of Pages:	1
File Date:	2/18/2011	Effective Date:	
(No notes for this action)			
Action Type:	Annual List		
Document Number:	20120094588-39	# of Pages:	1
File Date:	2/9/2012	Effective Date:	
(No notes for this action)			
Action Type:	Annual List		
Document Number:	20130043391-16	# of Pages:	1
File Date:	1/23/2013	Effective Date:	
(No notes for this action)			
Action Type:	Annual List		
Document Number:	20130823078-54	# of Pages:	1
File Date:	12/17/2013	Effective Date:	
(No notes for this action)			
Action Type:	Annual List		
Document Number:	20150081097-83	# of Pages:	1

File Date:	2/23/2015	Effective Date:	
(No notes for this action)			
Action Type:	Annual List		
Document Number:	20160107178-43	# of Pages:	1
File Date:	3/8/2016	Effective Date:	
(No notes for this action)			
Action Type:	Annual List		
Document Number:	20170084005-87	# of Pages:	1
File Date:	2/27/2017	Effective Date:	
(No notes for this action)			

Attachment 2

TATYANA DESIGNS, INC.

Business Entity Information			
Status:	Active	File Date:	2/3/2000
Type:	Domestic Corporation	Entity Number:	C3072-2000
Qualifying State:	NV	List of Officers Due:	2/28/2017
Managed By:		Expiration Date:	
NV Business ID:	NV20001201001	Business License Exp:	2/28/2017

Additional Information	
Central Index Key:	1113501

Registered Agent Information			
Name:	JAN GLASER	Address 1:	980 AMERICA PACIFIC DR., #100
Address 2:		City:	HENDERSON
State:	NV	Zip Code:	89014
Phone:		Fax:	
Mailing Address 1:		Mailing Address 2:	
Mailing City:		Mailing State:	
Mailing Zip Code:			
Agent Type:	Noncommercial Registered Agent		

Financial Information			
No Par Share Count:	0	Capital Amount:	\$ 30,000.00
Par Share Count:	25,000,000.00	Par Share Value:	\$ 0.001
Par Share Count:	5,000,000.00	Par Share Value:	\$ 0.001

Officers				<input type="checkbox"/> Include Inactive Officers
Director - SAM BATTISTONE				
Address 1:	980 AMERICAN PACIFIC DRIVE STE 100	Address 2:		
City:	HENDERSON	State:	NV	
Zip Code:	89014	Country:	USA	
Status:	Active	Email:		
Secretary - JAN GLASER				
Address 1:	980 AMERICAN PACIFIC DRIVE STE 100	Address 2:		
City:	HENDERSON	State:	NV	
Zip Code:	89014	Country:	USA	
Status:	Active	Email:		
Treasurer - JAN GLASER				
Address 1:	980 AMERICAN PACIFIC DRIVE STE 100	Address 2:		

City:	HENDERSON	State:	NV
Zip Code:	89014	Country:	USA
Status:	Active	Email:	
Director - JAN GLASER			
Address 1:	980 AMERICAN PACIFIC DRIVE STE 100	Address 2:	
City:	HENDERSON	State:	NV
Zip Code:	89014	Country:	USA
Status:	Active	Email:	
President - TATYANA KHOMYAKOVA			
Address 1:	980 AMERICAN PACIFIC DRIVE STE 100	Address 2:	
City:	HENDERSON	State:	NV
Zip Code:	89014	Country:	USA
Status:	Active	Email:	
Director - TATYANA KHOMYAKOVA			
Address 1:	980 AMERICAN PACIFIC DRIVE STE 100	Address 2:	
City:	HENDERSON	State:	NV
Zip Code:	89014	Country:	USA
Status:	Active	Email:	

Actions\Amendments			
Action Type:	Articles of Incorporation		
Document Number:	C3072-2000-001	# of Pages:	6
File Date:	2/3/2000	Effective Date:	
(No notes for this action)			
Action Type:	Initial List		
Document Number:	C3072-2000-008	# of Pages:	1
File Date:	3/17/2000	Effective Date:	
(No notes for this action)			
Action Type:	Annual List		
Document Number:	C3072-2000-007	# of Pages:	1
File Date:	3/9/2001	Effective Date:	
(No notes for this action)			
Action Type:	Registered Agent Change		
Document Number:	C3072-2000-003	# of Pages:	1
File Date:	10/23/2001	Effective Date:	
JERRY SMITH STE 800 BOX 8			
2300 W SAHARA AVE LAS VEGAS NV 89102 GXH			
Action Type:	Annual List		
Document Number:	C3072-2000-006	# of Pages:	1
File Date:	2/21/2002	Effective Date:	
(No notes for this action)			

Action Type:	Annual List		
Document Number:	C3072-2000-005	# of Pages:	1
File Date:	2/10/2003	Effective Date:	
(No notes for this action)			
Action Type:	Annual List		
Document Number:	C3072-2000-002	# of Pages:	2
File Date:	3/7/2004	Effective Date:	
List of Officers for 2004 to 2005			
Action Type:	Registered Agent Address Change		
Document Number:	C3072-2000-004	# of Pages:	23
File Date:	4/21/2004	Effective Date:	
DAVID A. GARCIA TENTH FLOOR ERR 100 WEST LIBERTY ST. RENO NV 89501 ERR			
Action Type:	Annual List		
Document Number:	20050053902-46	# of Pages:	2
File Date:	2/18/2005	Effective Date:	
(No notes for this action)			
Action Type:	Annual List		
Document Number:	20060089143-23	# of Pages:	1
File Date:	2/13/2006	Effective Date:	
(No notes for this action)			
Action Type:	Annual List		
Document Number:	20070251630-96	# of Pages:	1
File Date:	4/9/2007	Effective Date:	
(No notes for this action)			
Action Type:	Annual List		
Document Number:	20080045527-83	# of Pages:	1
File Date:	1/23/2008	Effective Date:	
(No notes for this action)			
Action Type:	Annual List		
Document Number:	20090145739-80	# of Pages:	1
File Date:	2/17/2009	Effective Date:	
(No notes for this action)			
Action Type:	Annual List		
Document Number:	20100075941-89	# of Pages:	1
File Date:	2/5/2010	Effective Date:	
(No notes for this action)			
Action Type:	Annual List		
Document Number:	20110060129-52	# of Pages:	1
File Date:	1/26/2011	Effective Date:	
(No notes for this action)			

Action Type:	Annual List		
Document Number:	20120131801-39	# of Pages:	1
File Date:	2/27/2012	Effective Date:	
(No notes for this action)			
Action Type:	Amendment		
Document Number:	20120546404-18	# of Pages:	2
File Date:	8/7/2012	Effective Date:	
Previous Stock Value: Par Value Shares: 30,000,000 Value: \$ 0.001 No Par Value Shares: 0 ----- ----- Total Authorized Capital: \$ 30,000.00 New Stock Value: Par Value Shares: 25,000,000 Value: \$ 0.001 Par Value Shares: 5,000,000 Value: \$ 0.001 No Par Value Shares: 0 ----- Total Authorized Capital: \$ 30,000.00			
Action Type:	Amended List		
Document Number:	20120557493-18	# of Pages:	2
File Date:	8/13/2012	Effective Date:	
(No notes for this action)			
Action Type:	Registered Agent Change		
Document Number:	20130049722-40	# of Pages:	1
File Date:	1/23/2013	Effective Date:	
(No notes for this action)			
Action Type:	Annual List		
Document Number:	20130043550-43	# of Pages:	2
File Date:	1/23/2013	Effective Date:	
(No notes for this action)			
Action Type:	Annual List		
Document Number:	20130823057-01	# of Pages:	2
File Date:	12/17/2013	Effective Date:	
(No notes for this action)			
Action Type:	Annual List		
Document Number:	20150081093-49	# of Pages:	2
File Date:	2/23/2015	Effective Date:	
(No notes for this action)			
Action Type:	Resignation of Officers		
Document Number:	20150483722-84	# of Pages:	1
File Date:	11/2/2015	Effective Date:	
(No notes for this action)			
Action Type:	Annual List		
Document Number:	20160107176-21	# of Pages:	2
File Date:	3/8/2016	Effective Date:	
(No notes for this action)			

TATYANA, LLC

Business Entity Information

Status:	Active	File Date:	9/5/2007
Type:	Domestic Limited-Liability Company	Entity Number:	E0620862007-3
Qualifying State:	NV	List of Officers Due:	9/30/2017
Managed By:	Managers	Expiration Date:	
NV Business ID:	NV20071075432	Business License Exp:	9/30/2017

Additional Information

Central Index Key:	
--------------------	--

Registered Agent Information

Name:	TATYANA KHOMYAKOVA	Address 1:	3850 PLACITA DEL RICO
Address 2:		City:	LAS VEGAS
State:	NV	Zip Code:	89120
Phone:		Fax:	
Mailing Address 1:		Mailing Address 2:	
Mailing City:		Mailing State:	
Mailing Zip Code:			
Agent Type:	Noncommercial Registered Agent		

Financial Information

No Par Share Count:	0	Capital Amount:	\$ 0
No stock records found for this company			

Officers

 Include Inactive Officers

Manager - JAN GLASER

Address 1:	980 AMERICAN PACIFIC DR. #100	Address 2:	
City:	HENDERSON	State:	NV
Zip Code:	89014	Country:	USA
Status:	Active	Email:	

Manager - TATYANA KHOMYAKOVA

Address 1:	980 AMERICAN PACIFIC DR. #100	Address 2:	
City:	HENDERSON	State:	NV
Zip Code:	89014	Country:	USA
Status:	Active	Email:	

Actions\Amendments

Action Type:	Articles of Organization		
Document Number:	20070607581-46	# of Pages:	2
File Date:	9/5/2007	Effective Date:	
(No notes for this action)			
Action Type:	Initial List		
Document Number:	20070616417-44	# of Pages:	1
File Date:	9/8/2007	Effective Date:	
(No notes for this action)			
Action Type:	Annual List		
Document Number:	20080470214-18	# of Pages:	1
File Date:	7/15/2008	Effective Date:	
(No notes for this action)			
Action Type:	Annual List		
Document Number:	20090568829-39	# of Pages:	1
File Date:	7/23/2009	Effective Date:	
(No notes for this action)			
Action Type:	Annual List		
Document Number:	20100618681-53	# of Pages:	1
File Date:	8/18/2010	Effective Date:	
(No notes for this action)			
Action Type:	Annual List		
Document Number:	20110633097-12	# of Pages:	1
File Date:	8/30/2011	Effective Date:	
(No notes for this action)			
Action Type:	Annual List		
Document Number:	20120630861-39	# of Pages:	1
File Date:	9/13/2012	Effective Date:	
(No notes for this action)			
Action Type:	Annual List		
Document Number:	20130448113-37	# of Pages:	1
File Date:	7/8/2013	Effective Date:	
(No notes for this action)			
Action Type:	Annual List		
Document Number:	20140521804-77	# of Pages:	1
File Date:	7/21/2014	Effective Date:	
(No notes for this action)			
Action Type:	Annual List		
Document Number:	20150367082-74	# of Pages:	1
File Date:	8/17/2015	Effective Date:	
(No notes for this action)			
Action Type:	Annual List		

Document Number:	20160432376-34	# of Pages:	1
File Date:	9/30/2016	Effective Date:	
(No notes for this action)			

DESIGN TECHNOLOGY HOLDING, LLC

Business Entity Information

Status:	Active	File Date:	6/21/2012
Type:	Domestic Limited-Liability Company	Entity Number:	E0336022012-5
Qualifying State:	NV	List of Officers Due:	6/30/2017
Managed By:	Managers	Expiration Date:	
NV Business ID:	NV20121393442	Business License Exp:	6/30/2017

Additional Information

Central Index Key:	
--------------------	--

Registered Agent Information

Name:	JAN GLASER	Address 1:	980 AMERICA PACIFIC DR., #100
Address 2:		City:	HENDERSON
State:	NV	Zip Code:	89014
Phone:		Fax:	
Mailing Address 1:		Mailing Address 2:	
Mailing City:		Mailing State:	
Mailing Zip Code:			
Agent Type:	Noncommercial Registered Agent		

Financial Information

No Par Share Count:	0	Capital Amount:	\$ 0
No stock records found for this company			

Officers

 Include Inactive Officers

Manager - JAN GLASER

Address 1:	980 AMERICAN PACIFIC DR. #100	Address 2:	
City:	HENDERSON	State:	NV
Zip Code:	89014	Country:	USA
Status:	Active	Email:	

Manager - TATYANA KHOMYAKOVA

Address 1:	980 AMERICAN PACIFIC DR. #100	Address 2:	
City:	HENDERSON	State:	NV
Zip Code:	89014	Country:	USA
Status:	Active	Email:	

Actions\Amendments

Action Type:	Articles of Organization		
Document Number:	20120435393-22	# of Pages:	2
File Date:	6/21/2012	Effective Date:	
(No notes for this action)			
Action Type:	Initial List		
Document Number:	20120435434-28	# of Pages:	1
File Date:	6/21/2012	Effective Date:	
(No notes for this action)			
Action Type:	Merge In		
Document Number:	20120546581-54	# of Pages:	6
File Date:	8/7/2012	Effective Date:	
(No notes for this action)			
Action Type:	Annual List		
Document Number:	20130276180-90	# of Pages:	1
File Date:	4/25/2013	Effective Date:	
(No notes for this action)			
Action Type:	Annual List		
Document Number:	20140294186-57	# of Pages:	1
File Date:	4/22/2014	Effective Date:	
(No notes for this action)			
Action Type:	Annual List		
Document Number:	20150220801-81	# of Pages:	1
File Date:	5/14/2015	Effective Date:	
(No notes for this action)			
Action Type:	Annual List		
Document Number:	20160413243-36	# of Pages:	1
File Date:	8/8/2016	Effective Date:	
16-17			

**UNITED STATES COURT OF APPEALS
FOR THE DISTRICT OF COLUMBIA CIRCUIT**

DESIGN TECHNOLOGY GROUP, LLC)	
d/b/a BETTIE PAGE CLOTHING and)	
DTG CALIFORNIA MANAGEMENT LLC,)	
d/b/a BETTIE PAGE)	
)	
Petitioner/Cross-Respondent)	
)	
v.)	Nos. 14-1232, 14-1303
)	
NATIONAL LABOR RELATIONS BOARD)	
)	Board Case No.
Respondent/Cross-Petitioner)	20-CA-35511
)	
and)	
)	
VANESSA MORRIS)	
)	
Intervenor)	

CERTIFICATE OF COMPLIANCE

Pursuant to Federal Rule of Appellate Procedure 32(g)(1), the Board certifies that its supplemental brief contains 1,144 words and 5 pages of proportionally-spaced, 14-point type, the word processing system used was Microsoft Word 2010.

/s/ Linda Dreeben
Linda Dreeben
Deputy Associate General Counsel
National Labor Relations Board
1015 Half Street, SE
Washington, DC 20570
(202) 273-2960

Dated at Washington, DC
this 2nd day of March, 2017

**UNITED STATES COURT OF APPEALS
FOR THE DISTRICT OF COLUMBIA CIRCUIT**

DESIGN TECHNOLOGY GROUP, LLC)	
d/b/a BETTIE PAGE CLOTHING and)	
DTG CALIFORNIA MANAGEMENT LLC,)	
d/b/a BETTIE PAGE)	
)	
Petitioner/Cross-Respondent)	
)	
v.)	Nos. 14-1232, 14-1303
)	
NATIONAL LABOR RELATIONS BOARD)	
)	Board Case No.
Respondent/Cross-Petitioner)	20-CA-35511
)	
and)	
)	
VANESSA MORRIS)	
)	
Intervenor)	

CERTIFICATE OF SERVICE

I certify that on March 2, 2017, the foregoing document was served on all parties or their counsel of record through the CM/ECF system if they are registered users or, if they are not, by serving a true and correct copy at the address listed below:

David Richard Koch
Koch & Scow LLC
11500 S. Eastern Avenue, Suite 210
Henderson, NV 89052

David A. Rosenfeld
Weinberg Roger & Rosenfeld
1001 Marina Village Parkway
Alameda, CA 94501-1091

/s/ Linda Dreeben

Linda Dreeben

Deputy Associate General Counsel

National Labor Relations Board

1015 Half Street, SE

Washington, DC 20570

Dated at Washington, D.C.
this 2nd day of March, 2017