

**NATIONAL LABOR RELATIONS BOARD
DIVISION OF JUDGES**

KYMANI HILL,)	
)	
Charging Party)	Case No. 13-CA-225710
)	
v.)	
)	
BIMBO BAKERIES USA, and)	
METROSTAFF, INC.)	
)	
Respondents.)	

**MOTION FOR EXTENSION OF DEADLINES AND FOR CONTINUANCE
OF THE HEARING DATE INDEFINITELY DUE TO SETTLEMENT**

COMES NOW, the Charging Party, Kymani Hill, by and through counsel, and files this Motion for Extension of Deadlines and for Continuance of the Hearing Date Indefinitely Due to Settlement, stating as follows:

1. Charging Party and Respondents have resolved this matter and have agreed on all material terms of a non-Board settlement, including both monetary and non-monetary terms, subject only to finalization of the written agreement and Board approval.
2. Counsel for the Charging Party has provided a drafted a complete version of the settlement agreement and has provided the draft to Counsel for Respondents. Respondents have agreed to provide any edits of revisions by Monday, July 8, 2019.
3. The hearing in this matter is scheduled for July 22, 2019.
4. In addition, counsel for the Charging Party recently suffered a death in his family which has required him to take some time off and respectfully suggests that it would be unnecessarily burdensome to have to prepare for trial in light the settlement.

WHEREFORE, Charging Party respectfully requests that the hearing date in this matter be continued indefinitely to allow the parties to finalize the non-Board settlement and seek approval of the settlement from the Board.

Respectfully submitted,

/s/Christopher J. Williams

Christopher J. Williams

National Legal Advocacy Network

53 W Jackson, Suite 1224

Chicago, Illinois 60604

ATTORNEY FOR CHARGING PARTY