

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

TINLEY PARK HOTEL AND CONVENTION	)	
CENTER, LLC	)	
Petitioner/Cross-Respondent	)	Nos. 19-1136
	)	19-1356
v.	)	
	)	
NATIONAL LABOR RELATIONS BOARD	)	
Respondent/Cross-Petitioner	)	

**JOINT MOTION TO VOLUNTARILY DISMISS  
THE PETITION FOR REVIEW AND  
THE CROSS-APPLICATION FOR ENFORCEMENT**

To the Honorable, the Judges of the United States  
Court of Appeals for the Seventh Circuit:

Pursuant to Federal Rule of Appellate Procedure 42(b), Tinley Park Hotel and Convention Center, LLC (“the Company”), by its counsel, and the National Labor Relations Board (“the Board”), by its Acting Deputy Associate General Counsel, respectfully move the Court for leave to voluntarily dismiss the Company’s petition for review and the Board’s cross-application for enforcement in the above-captioned case, and show:

1. On January 17, 2019, the Company filed with the Court a petition for review of the Board’s Decision and Order in *Tinley Park Hotel and Convention*

*Center, LLC*, 367 NLRB No. 60 (2019). The Board cross-applied for enforcement of its Order on February 26, and the Court consolidated the appeals.

2. Since then, the Company and the Board have sought to resolve these consolidated cases without further litigation or the costs associated with such litigation. The parties have reached such an agreement.

3. The parties, therefore, request that this Court dismiss the Company's petition for review and the Board's cross-application for enforcement.

4. Each side is to bear its own costs.

5. Laura A. Balson and Brianna L. Golan, counsel for the Company, have given the Board permission to sign this motion on their behalf.

WHEREFORE, the parties respectfully request that their joint motion be granted, and that the petition for review and the cross-application for enforcement be dismissed.

Respectfully submitted,

For the Board:

/s/ David Habenstreit  
David Habenstreit  
Acting Deputy Associate General Counsel  
National Labor Relations Board  
1015 Half Street, SE  
Washington, D.C. 20570  
(202) 273-2960

Dated: July 8, 2019

For the Company:

/s/ Laura A. Balson

/s/ Brianna L. Golan

Laura A. Balson and Brianna L. Golan  
GOLAN CHRISTIE TAGLIA LLP  
70 West Madison Street, Suite 1500  
Chicago, Illinois 60602  
(312) 263-2300

Dated: July 8, 2019

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	)	
NATIONAL LABOR RELATIONS BOARD	)	
Respondent/Cross-Petitioner	)	

**CERTIFICATE OF COMPLIANCE**

Pursuant to Federal Rule of Appellate Procedure 32(g)(1), the Board certifies that its document contains 355 words of proportionally-spaced, 14-point type, and the word processing system used was Microsoft Word 2016.

Respectfully submitted,

/s/ David Habenstreit  
David Habenstreit  
Acting Deputy Associate General Counsel  
National Labor Relations Board  
1015 Half Street, SE  
Washington, D.C. 20570

Dated at Washington, D.C.  
This 8th day of July 2019

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v.	)	
	)	Board Case No.
NATIONAL LABOR RELATIONS BOARD	)	13-CA-141609
Respondent/Cross-Petitioner	)	

**CERTIFICATE OF SERVICE**

I hereby certify that on July 8, 2019, I electronically filed the foregoing document with the Clerk of the Court for the United States Court of Appeals for the Seventh Circuit by using the CM/ECF system. I certify that the foregoing document will be served via the CM/ECF system on the following counsel, who are registered CM/ECF users:

Laura A. Balson and Brianna L. Golan  
GOLAN CHRISTIE TAGLIA LLP  
70 West Madison Street, Suite 1500  
Chicago, Illinois 60602

/s/ David Habenstreit \_\_\_\_\_  
David Habenstreit  
Acting Deputy Associate General Counsel  
National Labor Relations Board  
1015 Half Street, SE  
Washington, D.C. 20570  
(202) 273-2960

Dated at Washington, D.C.  
This 8th day of July 2019