

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

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**Nos. 19-1135, 19-1152**

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**PRIME HEALTHCARE PARADISE VALLEY, LLC  
Petitioner/Cross-Respondent**

**v.**

**NATIONAL LABOR RELATIONS BOARD  
Respondent/Cross-Petitioner  
and**

**RICHARD CARDONA  
Intervenor**

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**UNOPPOSED JOINT MOTION TO STAY BRIEFING**

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

The National Labor Relations Board, Prime Healthcare Paradise Valley, LLC, and Richard Cardona respectfully ask the Court to stay the briefing schedule in this case due to settlement. In support of their joint motion, the parties state as follows:

1. Prime Healthcare petitioned the Court for review of a Board order and the Board applied for enforcement of its order. Cardona intervened in support of the Board. The Court consolidated the cases.
2. Prime Healthcare's opening brief is currently due October 30.

3. The parties have reached an agreement that would resolve this case in lieu of further proceedings in this Court. The parties request that the Court stay the briefing schedule in this case to provide them with the time needed to comply with the terms of that agreement.

4. Counsel for Prime Healthcare and Cardona have authorized the Board to file this motion on their behalf.

WHEREFORE, the parties respectfully request that the Court stay the briefing schedule in this case.

Respectfully submitted,

/s/ David Habenstreit  
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*Counsel for Richard Cardona*

Dated at Washington, DC  
this 10th day of October, 2019

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**CERTIFICATE OF COMPLIANCE**

Pursuant to Federal Rule of Appellate Procedure 32(g)(1), the Board certifies that this motion contains 181 words of proportionally spaced, 14-point type, and that the word-processing system used was Microsoft Word 2016.

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**CERTIFICATE OF SERVICE**

I hereby certify that on October 10, 2019, I electronically filed the foregoing document with the Clerk of the Court for the United States Court of Appeals for the District of Columbia Circuit by using the CM/ECF system. I certify that the foregoing document will be served via the CM/ECF system on all parties or their counsel of record.

/s/ David Habenstreit

David Habenstreit  
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Dated at Washington, DC  
this 10th day of October, 2019