

NATIONAL LABOR RELATIONS)	
BOARD,)	
)	
Petitioner,)	No. 19-71804
)	
v.)	
)	
AIM AEROSPACE SUMNER, INC.,)	
)	
Respondent)	

**UNOPPOSED JOINT MOTION BY AIM AEROSPACE SUMNER
AND NATIONAL LABOR RELATIONS BOARD
TO EXTEND ORAL ARGUMENT TIME**

NOW COME AIM Aerospace Sumner, Inc. (AIM) and National Labor Relations Board (Board), and jointly move that the Court extend the time for oral argument as described below. This motion is not opposed by International Association of Machinists District Lodge 751 (Union).

1. This is a consolidated case involving separate petitions filed by the Union and AIM seeking review of an order of the Board. The interests of the Union and AIM, however, are not aligned. The Union seeks review of the Board’s dismissal of allegations by the Union that AIM unlawfully withdrew recognition from the Union. On this issue, AIM has intervened in support of the Board. AIM seeks review of the Board’s determination that the Company committed an unfair labor practice by promoting a particular employee. On this issue, the Union has intervened in

support of the Board. The Board has filed a cross-application for enforcement of its order.

2. This case is currently scheduled for oral argument on July 8, 2020. The Court has allotted 15 minutes for Petitioners and 15 minutes for the Board. This has created confusion because AIM and the Union are not aligned in interest and are challenging completely different parts of the Board's Decision and Order. In these circumstances, requiring AIM and the Union to share argument time creates confusion and disagreement. It is believed that the oral argument process will be facilitated if AIM and the Union are each granted a specified amount of time to present their argument without having to share that time with the other party.

3. In order to prevent confusion during oral argument and to facilitate the Court's understanding of the issues, AIM and the Board, without opposition from the Union, propose and request that the Court extend the time for oral argument in the following manner:

Petitioner IAM District Lodge 751	10 minutes
Petitioner AIM Aerospace Sumner	10 minutes
Respondent National Labor Relations Board	15 minutes

4. Should the Court grant this motion, it would only extend the total oral argument time by 5 minutes.

WHEREFORE AIM and the Board, without opposition from the Union, respectfully request that the Court extend the time for oral argument in the manner described above.

This 17th day of June 2020.

/s/ Charles P. Roberts III

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CERTIFICATE OF SERVICE

I hereby certify that I electronically filed the foregoing with the Clerk of the Court for the United States Court of Appeals for the Ninth Circuit by using the appellate CM/ECF system on June 17, 2020.

I certify that all participants in the case are registered CM/ECF users and that service will be accomplished by the appellate CM/ECF system.

June 17, 2020

CONSTANGY, BROOKS, SMITH &
PROPHETE LLP

By: /s/ Charles P. Roberts, III

CHARLES P. ROBERTS, III

Attorney for Petitioner, Intervenor and
Respondent AIM Aerospace Sumner, Inc