
No. 20-13027

**IN THE UNITED STATES COURT OF APPEALS
FOR THE ELEVENTH CIRCUIT**

NATIONAL LABOR RELATIONS BOARD,

Petitioner,

vs.

E. A. RENFROE & COMPANY, INC.

Respondent.

**RESPONDENT'S UNOPPOSED MOTION FOR
EXTENSION TO RESPOND TO APPLICATION FOR
ENFORCEMENT OF AN ORDER OF THE NATIONAL LABOR
RELATIONS BOARD**

CERTIFICATE OF INTERESTED PERSONS

Counsel of record for E. A. Renfroe & Company, Inc. certifies that the following persons have an interest in the outcome of this appeal.

Kamani Adams – Charging Party

Burr & Forman LLP – Counsel for Appellee

David Habenstreit – Counsel for Petitioner

E. A. Renfroe & Company, Inc. - Respondent

Marvin E. Kaplan - Member, National Labors Relation Board

Elizabeth Heaney – Counsel for Petitioner

Joel Heller – Counsel for Petitioner

Keltner W. Locke - Administrative Law Judge

Lauren McFerran - Member, National Labors Relation Board

Bryance Metheny – Counsel for Respondent

Ashley Hattaway–General Counsel, E.A. Renfroe & Company, Inc.

National Labor Relations Board – Petitioner

Matthew Scully– Counsel for Respondent

John F. Ring - Chairman, National Labors Relation Board

CORPORATE DISCLOSURE STATEMENT

Respondent E. A. Renfroe & Company, Inc. is a Georgia corporation with its principal place of business in Birmingham, Alabama. Renfroe is not a publicly-held corporation, does not issue stock, and does not have a parent corporation.

UNOPPOSED MOTION FOR EXTENSION OF TIME

Under Federal Rule of Appellate Procedure 26(b) and Eleventh Circuit Rules 26-1, Respondent, E. A. Renfroe & Company, Inc. (“Renfroe”), moves for an extension of time for its Response to Application for Enforcement of an Order of the National Labor Relations Board (“NLRB”), which is due tomorrow, September 2, 2020. In support of this motion, Renfroe states:

1. The Application for Enforcement of an Order of the National Labor Relations Board (“Application”) was filed on August 12, 2020.
2. Renfroe’s response to the Application is due September 2, 2020.
3. The parties are actively engaged in efforts to resolve this matter and expect those efforts to extend at least through September 29, 2020.
4. The interests of economy would be served by extending the answer deadline to allow the parties to complete their efforts to resolve this matter before requiring Renfroe to expend the time and resources necessary to prepare its response to the Application.

5. Given the ongoing efforts to resolve the case, Renfroe's counsel requests until October 7, 2020, to prepare its response to the Application.

6. The undersigned certifies that counsel for Renfroe contacted counsel for NLRB and they do not oppose this request.

THEREFORE, for the reasons stated above, E. A. Renfroe and Company, Inc. respectfully requests that the Court enter an order extending the deadline to file the response to the Application to October 7, 2020.

/s/ K. Bryce Metheny

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*Attorneys for Respondent,
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CERTIFICATE OF COMPLIANCE WITH RULE 32

This motion complies with the type-face requirements of Federal Rule of Appellate Procedure 32(a)(5) and the type-style requirements of Federal Rule of Appellate Procedure 32(a)(6). This motion has been prepared in 14-point Century Schoolbook, which is a proportionally spaced font that includes serifs.

This motion complies with the type-volume limitations in Federal Rule of Appellate Procedure 27(d)(2)(A) because it contains 231 words, excluding the cover, certificate of interested persons, corporate disclosure statement, signature block, Rule 32 certificate, and certificate of service.

/s/ K. Bryance Metheny
K. Bryance Metheny

CERTIFICATE OF SERVICE

I hereby certify that on September 1, 2020, I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF System, which will send a notice of electronic filing to the following:

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