



ARMIN J. MOELLER, JR.
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November 3, 2020

VIA NLRB PORTAL AND VIA EMAIL
(SEAN.MARSHALL@NLRB.GOV)

Sean Marshall, Regional Director
National Labor Relations Board, Region 5
100 S. Charles St., Suite 600 (Tower II)
Baltimore, MD 21201

RE: NLRB Petition – M.C. Dean, Inc.
Case Number: 05-RC-267942
Request for Postponement

Dear Mr. Marshall:

I write on behalf of the Employer in the above-referenced case to request that the pre-election hearing which is currently scheduled for Thursday, November 12, 2020, be postponed to Tuesday, November 17, 2020.

The reason for this request is that I am unavailable for the hearing on November 12, 2020, due to previously scheduled depositions and related travel in another matter. (See attachment 1). The depositions are scheduled for Wednesday, November 11, 2020 in Houston, Texas, and Friday, November 13, 2020 in Pittsburgh, Pennsylvania. I will be flying from Houston, Texas to Pittsburgh, Pennsylvania on November 12, 2020.

The Employer submits that this constitutes good cause pursuant to 29 C.F.R. § 102.63(a)(1). The Union does not oppose this request and agrees that November 17, 2020, is a suitable date. In addition, Field Examiner Cameron Myers was promptly informed by me of these circumstances upon our receipt of the Notice of Hearing.

November 3, 2020

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By copy of this letter, I am serving this request on all other parties. Thank you for your attention to this request.

Sincerely,

A handwritten signature in cursive script that reads "Armin".

Armin J. Moeller, Jr.

AJM/kp

cc: Cameron Myers, Field Examiner (Cameron.Myers@NLRB.gov)
Eamon Clifford (EClifford@iuoelocal99.org)

IN THE CIRCUIT COURT OF LOWNDES COUNTY, MISSISSIPPI

STEEL DYNAMICS COLUMBUS, LLC

PLAINTIFF

VERSUS

CIVIL ACTION NO.: 2018-0041-CV-1C

JINDAL TUBULAR USA LLC

DEFENDANT

NOTICE TO TAKE DEPOSITION

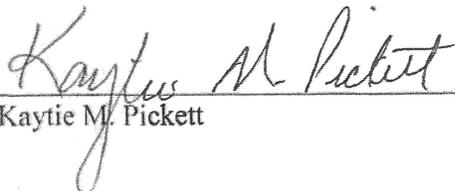
PLEASE TAKE NOTICE that Plaintiff Steel Dynamics Columbus, LLC ("SDI"), by and through its attorneys of record, will take the testimony on oral examination of **Dr. J. Malcolm Gray** before an officer authorized by law to administer oaths on **Wednesday, November 11, 2020, at 9:00 a.m.** at the offices of **Dr. J. Malcolm Gray, 5100 Westheimer, Suite 540, Houston, Texas 77056.**

This deposition will be recorded by a stenographer and/or videographer and will continue from day to day until completed. You are invited to participate as you see fit.

Respectfully submitted, this the 6th day of October, 2020.

STEEL DYNAMICS COLUMBUS, LLC

By Its Attorneys
JONES WALKER LLP

By: 
Kaytie M. Pickett

Adam Stone (MSB No. 10412)
Kaytie M. Pickett (MSB No. 103202)
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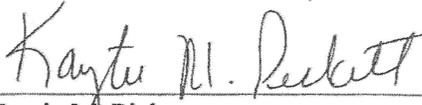
CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true and correct copy of the foregoing document to the below-identified counsel of record via electronic mail and/or United States Mail:

Armin J. Moeller, Jr.
Matthew McDade
Balch & Bingham LLP
Post Office Box 22587
Jackson, MS 39225-2587

Matthew W. McDade
BALCH & BINGHAM LLP
1310 Twenty Fifth Avenue
Gulfport, MS 39501

This, the 6th day of October, 2020.



Kaytie M. Pickett

IN THE CIRCUIT COURT OF LOWNDES COUNTY, MISSISSIPPI

STEEL DYNAMICS COLUMBUS, LLC

PLAINTIFF

V.

CIVIL ACTION NO. 2018-0041-CV-1C

JINDAL TUBULAR USA, LLC

DEFENDANT

NOTICE OF DEPOSITION OF DR. ROBERT GLODOWSKI

TO: Adam Stone
Kaytie M. Pickett
JONES WALKER LLP
190 East Capitol Street, Suite 800
Jackson, MS 39201

PLEASE TAKE NOTICE that Defendant Jindal Tubular USA, LLC (“Jindal”), by and through its counsel, will take the deposition of Dr. Robert Glodowski on **Friday, November 13, 2020, at 9:00 a.m.**, at the Drury Inn & Suites Pittsburgh Airport Settlers Ridge located at **101 Ridge Rd., Pittsburgh, PA 15205**. The deposition will be taken by video and/or stenographic means in the above-referenced matter before a notary public or other official authorized by law to administer oaths. This deposition will continue from day to day until complete.

Respectfully submitted, this the 16th day of October, 2020.

JINDAL TUBULAR USA, LLC

By: /s/ Armin J. Moeller, Jr.

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CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true and correct copy of the foregoing document to the below-identified counsel of record via electronic mail and/or United States Mail:

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war@barrettlaw.com

This, the 16th day of October, 2020.

/s/ Armin J. Moeller, Jr.

ARMIN J. MOELLER, JR.