

UNITED STATES COURT OF APPEALS  
FOR THE SIXTH CIRCUIT

MOTOR CITY PAWN BROKERS INC.,

Petitioner Cross-Respondent,

COA Case No. 20-1854

v.

THE NATIONAL LABOR RELATIONS  
BOARD,

NLRB Case Nos.

07-CA-179458

07-CA-179461

Respondent Cross-Petitioner.

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**MOTION TO INTERVENE BY INTERESTED PARTIES PATRICIA  
TILMON, TERRENCE WALKER, AND GIANLUCA BARTOLUCCI**

Pursuant to Federal Rule of Appellate Procedure 15(d), Patricia Tilmon (“Tilmon”), Terrence Walker (“Walker”) and Gianluca Bartolucci (“Bartolucci”) move to intervene in the cross-application for enforcement of the National Labor Relations Board (“NLRB”) Order against the Petitioner, Motor City Pawn Brokers Inc. Tilmon, Walker, and Bartolucci seek to intervene on the side of the NLRB and state the following in support:

Tilmon and Walker are the Charging Parties who initiated the underlying NLRB proceedings that gave rise to Motor City Pawn Broker Inc.’s Petition for Review. (NLRB Case Nos. 07-CA-179458 and 07-CA-179461). Mr. Bartolucci was added as a Charging Party in the above-referenced NLRB Cases when the amended charge was filed.

Tilmon, Walker, and Bartolucci have a substantial interest in the outcome of this matter. It is their labor rights that are at stake in this case, since the NLRB ruled that Motor City Pawn Brokers Inc. violated their rights. Tilmon, Walker, and Bartolucci have a direct and concrete interest in defending the NLRB's ruling and in ensuring that they and their fellow bargaining unit employees receive a proper remedy from Motor City Pawn Brokers for the violations they suffered.

Through their retained counsel, Tilmon, Walker, and Bartolucci have participated in all aspects of this case since its inception, from the trial before the administrative law judge through the exceptions process at the NLRB.

Moreover, as the Charging Parties in the underlying NLRB unfair labor practice cases, Tilmon, Walker, and Bartolucci have a right to intervene in an appellate proceeding in which the company appeals an NLRB decision arising from their unfair labor practice charge and the NLRB cross-petitions for enforcement. *See UAW Local 283 v. Scofield*, 382 U.S. 205, 208, 217-22 (1965) (recognizing the right of a successful charging party to intervene in such an appellate proceeding).

WHEREFORE, Patricia Tilmon, Terrence Walker, and Gianluca Bartolucci move this Court for permission to intervene as full parties to brief and argue on the side of the Respondent NLRB.

Respectfully submitted,

Dated: November 4, 2020

/s/ Angela L. Walker  
Angela L. Walker (P67625)

Blanchard & Walker, PLLC  
Attorneys for Tilmon, Walker, and  
Bartolucci  
221 N. Main Street, Suite 300  
Ann Arbor, MI 48104  
(734) 929-4313  
walker@bwlawonline.com

**CERTIFICATE OF COMPLIANCE**

Pursuant to Federal Rules of Appellate Procedure 27(d), 32(a)(5) and 32(a)(6), the undersigned certifies that this motion contains 340 words of proportionally spaced, 14-point type, and that the word-processing system used was Microsoft Word.

Respectfully submitted,

/s/ Angela L. Walker  
Angela L. Walker (P67625)  
Blanchard & Walker, PLLC  
Attorneys for Tilmon, Walker and  
Bartolucci  
221 N. Main Street, Suite 300  
Ann Arbor, MI 48104  
(734) 929-4313  
walker@bwlawonline.com

**CERTIFICATE OF SERVICE**

I hereby certify that on the 4th day of November, 2020, a true and correct copy of the foregoing Motion to Intervene was filed with the Court's ECF system, and all current parties have thereby been served.

Respectfully submitted,

/s/ Angela L. Walker  
Angela L. Walker (P67625)  
Blanchard & Walker, PLLC  
Attorneys for Tilmon, Walker and  
Bartolucci  
221 N. Main Street, Suite 300  
Ann Arbor, MI 48104  
(734) 929-4313  
walker@bwlawonline.com