

20-1197/20-1232
Oral Argument Has Not Been Scheduled

UNITED STATES COURT OF APPEALS
FOR THE DISTRICT OF COLUMBIA

NAPLETON 1050, INC. D/B/A NAPLETON CADILLAC OF LIBERTYVILLE,
Petitioner,

v.

NATIONAL RELATIONS LABOR BOARD,
Respondent.

PETITIONER’S UNOPPOSED MOTION FOR 60-DAY EXTENSION OF
BRIEFING DEADLINES

Petitioner, Napleton 1050, Inc. d/b/a Napleton Cadillac of Libertyville (“Napleton” or “Petitioner”), by and through its undersigned attorneys, respectfully moves this Court for a 60-day extension on briefing, and states as follows:

1. On September 3, 2020, this Court entered a Clerk’s Order, setting forth the briefing schedule as follows: Petitioner’s brief due 10/13/2020; Respondent’s Brief due on 11/12/2020; and Petitioner’s Reply Brief due 12/03/2020.
2. Prior to, and since this Court entered the September 3, Order, Napleton has engaged in efforts to settle the issues concerning its Petition, and Respondent’s Cross-Petition.

3. On October 2, 2020, this Court previously granted Petitioner's unopposed motion for a 30-day extension, and set the briefing schedule as follows: Petitioner Brief due 11/12/2020; Respondent Brief due on 12/14/2020; and Petitioner Reply Brief due 01/04/2021.
4. The parties' continue to work on settling this matter, but need more time to do so.
5. Petitioner's counsel has conferred with Respondent's counsel regarding a briefing extension, and Respondent's counsel has notified Napleton's counsel that it does not oppose a 60-day extension to the briefing schedule.

WHEREFORE, Petitioner respectfully requests that the Court grant its unopposed 60-day extension of the current briefing schedule.

Respectfully submitted,

Napleton 1050, Inc.

By: /s/ Tae Y. Kim
One of Its Attorneys

Dated: November 6, 2020

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CERTIFICATE OF SERVICE

I certify that a copy of the foregoing is being filed with the Clerk of the Court using the CM/ECF system, thereby serving it on all parties of record, this 6th day of November, 2020.

/s/ Tae Y. Kim _____

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