

**UNITED STATES COURT OF APPEALS
FOR THE SEVENTH CIRCUIT**

MONDELÉZ GLOBAL, LLC,)	
)	
Petitioner-Cross-Respondent,)	Case Nos. 20-1701, 20-1616
)	
v.)	Board Case Nos.
)	22-CA-174272, et al.
NATIONAL LABOR RELATIONS BOARD,)	
)	
Respondent-Cross-Petitioner,)	
)	
and)	
)	
BAKERY, CONFECTIONARY, TOBACCO WORKERS AND GRAIN MILLERS INTERNATIONAL UNION, AFL-CIO, LOCAL 719,)	
)	
Intervenor-Respondent.)	
)	

**NOTICE OF MOTION FOR LEAVE TO FILE A SUPPLEMENTAL
DOCUMENT**

PLEASE TAKE NOTICE that the undersigned counsel for Mondelēz Global, LLC (hereinafter referred to as “Petitioner” or “MG”), respectfully moves this Court for an Order for leave to file a supplemental document to include MG’s Brief in Support of its Exceptions to the Decision of the Administrative Law Judge (“Exceptions Brief”) for this Court’s review. The Exceptions Brief is attached as Exhibit A to the enclosed Affidavit.

WHEREFORE, MG relies upon the enclosed Affidavit in Support of

Motion for Leave to File a Supplemental Document

WHEREFORE, MG respectfully requests that the Court grant this motion and consider the Exceptions Brief.

Dated: December 14, 2020

Respectfully submitted,

JACKSON LEWIS P.C.

By: /s/ Daniel D. Schudroff
Daniel D. Schudroff
Jackson Lewis P.C.
666 Third Avenue, 29th Floor
New York, New York 10017
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Respondent, Mondelēz Global, LLC

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)	

CERTIFICATE OF COMPLIANCE

Pursuant to Federal Rule of Appellate Procedure 27(d)(2), MG certifies that the foregoing Motion for Leave to File a Supplemental Document and Affidavit in Support of Motion for Leave to File a Supplemental Document contains 399 words of proportionally-spaced, 14-point type, and the word processing system used was Microsoft Word 365 Pro Plus, and the PDF file submitted to the Court has been scanned for viruses using Microsoft Defender and is virus-free according to that program.

CERTIFICATE OF SERVICE

I certify that on December 14, 2020, I electronically filed the foregoing Motion for Leave to File a Supplemental Document and Affidavit in Support of Motion for Leave to File a Supplemental Document with the Clerk of the Court for the United States Court of Appeals for the Seventh Circuit by using the CM/ECF system, which will send electronic notice of such filing to counsel of record for all parties.

Respectfully submitted,

By: /s/ Daniel D. Schudroff
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