

**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.)	
)	

**AFFIDAVIT IN SUPPORT OF MOTION FOR LEAVE TO FILE A
SUPPLEMENTAL DOCUMENT**

DANIEL D. SCHUDROFF, being duly sworn, deposes and says:

1. I am Counsel for Petitioner-Cross-Respondent, Mondelēz Global, LLC (hereinafter referred to as “Petitioner” or “MG”), in the above-captioned matter. As such, I am fully familiar with the facts and circumstances contained herein. This Affidavit is submitted in support of MG’s motion 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 hereto as Exhibit A.

2. On April 4, 2019, Petitioner filed its Exceptions Brief with the National Labor Relations Board.

3. On May 26, 2020, the Assistant General Counsel for the National Labor Relations Board filed a certified copy of the agency record. See, ECF Docs. #14-1 through #14-10.

4. Pursuant to 29 C.F.R. § 102.45(b), briefs in support of exceptions are not considered part of the record before this Court. However, exceptions and answering briefs are considered part of the record. 29 C.F.R. § 102.45(b).

5. On November 9, 2020, Intervenor-Respondent, The Bakery, Confectionery, Tobacco Workers, and Grain Millers International Union, Local 719, AFL-CIO, Local 719, ("Union"), filed its brief in connection with the instant matter. See, ECF Doc. #28.

6. The Union's brief raises an issue which MG plans to respond to in its brief due December 14, 2020. However, MG's anticipated response will rely upon a citation to the Exceptions Brief, which is not part of the record presently before this Court. Accordingly, MG respectfully moves for leave to file its

Exceptions Brief so that this Court can fully evaluate MG's anticipated response concerning this issue.

7. The National Labor Relations Board and the Union do not oppose MG's instant motion.



DANIEL D. SCHUDROFF

Sworn to before me this
14th day of December, 2020.



Notary Public
MCMANUS MEGANN K
Notary Public State of New York
No. 02MC6379687
Qualified in New York County
Expired 05/20/2022