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No. 20-13027

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**IN THE UNITED STATES COURT OF APPEALS  
FOR THE ELEVENTH CIRCUIT**

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NATIONAL LABOR RELATIONS BOARD,

*Petitioner,*

vs.

E. A. RENFROE & COMPANY, INC.

*Respondent.*

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**ON APPEAL FROM THE  
NATIONAL LABOR RELATIONS BOARD  
CASE NO. 10-CA-171022**

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**UNOPPOSED MOTION FOR EXTENSION OF TIME**

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K. Bryance Metheny  
E. Travis Ramey  
Matthew Scully  
BURR & FORMAN LLP  
420 North 20th Street, Suite 3400  
Birmingham, AL 35203  
Telephone: (205) 251-3000  
Facsimile: (205) 458-5100

*Attorneys for Respondent E. A. Renfroe & Company, Inc.*

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**RESPONDENT E. A. RENFROE & COMPANY, INC.'S  
CERTIFICATE OF INTERESTED PERSONS AND  
CORPORATE DISCLOSURE STATEMENT**

The undersigned counsel of record for Respondent E. A. Renfroe & Company, Inc. hereby certifies that the following persons have an interest in the outcome of this appeal. The Respondent makes these representations for the Judges of this court to evaluate possible disqualification or recusal:

Adams, Kamani – Charging Party

Burr & Forman LLP – Counsel for Appellee

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*National Labor Relations Board vs. E. A. Renfroe & Company, Inc.*

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E. A. Renfroe & Company, Inc. – Respondent

Habenstreit, David – Counsel for Petitioner

Hattaway, Ashley – General Counsel, E.A. Renfroe & Company, Inc.

Heaney, Elizabeth – Counsel for Petitioner

Heller, Joel – Counsel for Petitioner

Kapla, Marvin E. - Member, National Labors Relation Board

Locke, Keltner W. - Administrative Law Judge

McFerran, Lauren - Member, National Labors Relation Board

Metheny, K. Bryance – Counsel for Respondent

National Labor Relations Board – Petitioner

Ring, John F. – Chairman - National Labors Relation Board

Ramey, E. Travis – Counsel for Respondent

Scully, Matthew – Counsel for Respondent

*s/ E. Travis Ramey* \_\_\_\_\_

E. Travis Ramey  
Counsel of Record for the  
Respondent E.A. Renfroe &  
Company, Inc.

**UNOPPOSED MOTION FOR EXTENSION OF TIME**

Under Federal Rule of Appellate Procedure 26(b) and Eleventh Circuit Rule 26-1, Respondent E.A. Renfroe & Company, Inc. [Renfroe] moves the Court for a thirty-day extension of the December 28, 2020 deadline to file its Brief of Respondent. In support of this motion, Renfroe states the following.

1. Renfroe's Brief of Respondent is currently due on December 28, 2020.

2. Renfroe and Petitioner National Labor Relations Board are currently engaged in discussions to settle this matter and have made substantial progress toward reaching a settlement.

3. In the interests of economy, Renfroe wishes to delay the filing of a brief that may become unnecessary if the parties are successful in negotiating a settlement.

4. Given the inherent delays associated with the upcoming holiday season, Renfroe is concerned that the parties may not have exhausted settlement efforts by the current December 28, 2020 deadline. Further, should the parties' negotiations not produce a

settlement, Renfroe is concerned it will be left with insufficient time to prepare its Brief of Respondent.

5. Therefore, Renfroe requests a thirty-day extension of the briefing deadline to allow the parties sufficient time to conclude settlement negotiations. Renfroe anticipates that within that thirty-day period, Renfroe will either file its Brief of Respondent or the parties will move to dismiss this appeal.

6. Renfroe's counsel has contacted counsel for the National Labor Relations Board. The Board does not oppose this motion.

Therefore, for the reasons stated above, Respondent E.A. Renfroe & Company, Inc. requests that the Court enter an order extending the deadline to file the Brief of Respondent until January 27, 2021.

Respectfully submitted,

*s/ E. Travis Ramey*

E. Travis Ramey

One of the Attorneys for Respondent  
E.A. Renfroe & Company, Inc.

**OF COUNSEL**

K. Bryance Metheny

E. Travis Ramey

Matthew Scully

BURR & FORMAN LLP

420 North 20th Street, Suite 3400

Birmingham, AL 35203

Telephone: (205) 251-3000

Facsimile: (205) 458-5100

[bmetheny@burr.com](mailto:bmetheny@burr.com)

[tramey@burr.com](mailto:tramey@burr.com)

[mscully@burr.com](mailto:mscully@burr.com)

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**CERTIFICATE OF COMPLIANCE WITH RULE 32**

This motion complies with the type-face requirements of Federal Rule of Appellate Procedure 32(a)(5) and the type-style requirements of Federal Rule of Appellate Procedure 32(a)(6). The motion has been prepared in 14-point Century Schoolbook, which is a proportionally spaced font that includes serifs.

This motion complies with the type volume limitations in Federal Rule of Appellate Procedure 27(d)(2)(A) because it contains 272 words, excluding the cover, certificate of interested persons, the signature block, the Rule 32 certificate, and the certificate of service.

*s/ E. Travis Ramey*

\_\_\_\_\_  
OF COUNSEL

Dated: December 17, 2020

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*National Labor Relations Board vs. E. A. Renfroe & Company, Inc.*

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**CERTIFICATE OF SERVICE**

I hereby certify that on December 17, 2020, I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF System, which will send a notice of electronic filing to the following:

David Habeinstreit  
Assistant General Counsel  
NATIONAL LABOR RELATIONS BOARD  
1015 Half Street, SE  
Washington, DC 20570

Elizabeth A. Heaney  
Joel Heller  
NATIONAL LABOR RELATIONS BOARD  
1015 Half Street, SE  
Washington, DC 20570

**By Mail**

Kimani Adams  
345 Twin Lakes Drive  
Gray, GA 31032-5033

*s/ E. Travis Ramey*  
\_\_\_\_\_  
OF COUNSEL