

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 30-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 30-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 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. On November 6, 2020, Petitioner filed an unopposed motion for a 60-day extension, because the parties' settlement negotiations had not concluded.
5. On November 6, 2020, this Court granted Petitioner's motion, and entered a clerk's order, setting the briefing schedule as follows: Petitioner's Brief due 01/11/2021; Respondent's Brief due on 02/10/2021; Petitioner's Reply Brief due 03/03/2021.
6. On January 20, 2021, Petitioner filed an unopposed motion for a 30-day extension, because the parties' settlement negotiations had not concluded.
7. On January 6, 2021, this Court granted Petitioner's motion, and entered a clerk's order, setting the briefing schedule as follows: Petitioner's Brief due 02/10/2021; Respondent's Brief due on 03/12/2021, and Petitioner's Reply Brief due 04/02/2021.
8. The parties' continue to work on settling this matter and have made progress, but still need more time to resolve the matter.

9. Petitioner's counsel has conferred with Respondent's counsel regarding a briefing extension, and Respondent's counsel has notified Petitioner's counsel that it does not oppose a 30-day extension to the briefing schedule.

WHEREFORE, Petitioner respectfully requests that the Court grant its unopposed 30-day extension of the current briefing schedule.

Respectfully submitted,

Napleton 1050, Inc.

By: /s/ Tae Y. Kim

One of Its Attorneys

Dated: February 8, 2021

Tae Y. Kim (tkim@freeborn.com)
Freeborn & Peters LLP
311 S. Wacker Drive, Suite 3000
Chicago, Illinois 60606
(312) 360-6000
(312) 360-6520 (Fax)

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TYPEFACE REQUIREMENTS, AND TYPE-STYLE REQUIREMENTS**

1. This document complies with the page limit and type-volume limit of Fed. R. App. P. 32(a)(7)(A)-(B) because, excluding the parts of the document exempted by Fed. R. App. P. 32(f), this document contains 320 words.

2. This document complies with the typeface requirements of Fed. R. App. P. 32(a)(5) and the type-style requirements of Fed. R. App. P. 32(a)(6) because this document has been prepared in a proportionally spaced typeface using Microsoft Word in 14 point Times New Roman font for the main text and footnotes.

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 8th day of February, 2021.

/s/ Tae Y. Kim _____

Tae Y. Kim
Freeborn & Peters LLP
311 S. Wacker Drive, Suite 3000
Chicago, Illinois 60606
(312) 360-6000
(312) 360-6520 (Fax)

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