

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WISCONSIN**

JENNIFER A. HADSALL, Regional Director of Region 18 of the National Labor Relations Board, for and on behalf of the NATIONAL LABOR RELATIONS BOARD, v. ADT, LLC,	Petitioner Respondent	Civil No. 3:21-cv-9
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MOTION FOR LEAVE TO FILE DOCUMENTS

Pursuant to the Order of the District Court dated January 13, 2021, Petitioner will be submitting a fair and accurate copy of the administrative record in the above-referenced proceeding through a separate filing. By this Motion, Petitioner requests permission to electronically file the administrative record as *three* attachments: (1) The complete certified transcript of the hearing held before Administrative Law Judge Michael Rosas on January 20 and 21, 2021; (2) General Counsel’s Exhibits, which were received into evidence in the administrative proceeding; and (3) Respondent’s Exhibits, which were also received into evidence in the administrative proceeding.¹ These three attachments constitute the complete administrative record in the above matter.

The Western District Court’s Electronic Filing Procedures require that users electronically file “each exhibit as a separate attachment with a descriptive title.” (Electronic Filing Procedures, Section V.D.) As described above, Petitioner seeks leave to file the exhibits from the administrative proceeding as simply two separate attachments: General Counsel Exhibits and Respondent Exhibits, rather than separating them into approximately 45

¹ Both exhibit files contain embedded bookmarks to the numbered exhibits.

attachments. Petitioner believes filing the exhibits in this fashion is appropriate for the several reasons. First, this Court will not be asked to make any evidentiary rulings on the documents contained in these two files. Second, filing the documents as two attachments with bookmarks to exhibit numbers will allow for more convenient access to the documents by the Court and is consistent with how the official record is maintained by the National Labor Relations Board. Third, the alternative would require Petitioner to fashion descriptions of all exhibits already entered into the completed administrative record, including those exhibits offered by Respondent. Finally, Petitioner believes the administrative record in this matter to be akin to the “Social Security Hearing Transcripts” as detailed in Section V.H. of the Electronic Filing Procedures, which contemplates filing an administrative transcript with functioning bookmarks to each exhibit in the record. As already noted, both exhibit files will contain bookmarks to every numbered exhibit.

Dated: February 5, 2021.

Respectfully submitted,

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