
No. 20-13027

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

NATIONAL LABOR RELATIONS BOARD,

Petitioner,

vs.

E. A. RENFROE & COMPANY, INC.

Respondent.

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

**TIME-SENSITIVE UNOPPOSED
MOTION FOR EXTENSION OF TIME**

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No. 20-13027

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FOR THE ELEVENTH CIRCUIT**

NATIONAL LABOR RELATIONS BOARD,

Petitioner,

vs.

E. A. RENFROE & COMPANY, INC.

Respondent.

**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

No. 20-13027

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

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.

TIME SENSITIVE 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 an extension of the February 26, 2021 deadline to file its Brief of Respondent to March 29, 2021. In support of this motion, Renfroe states the following.

1. Renfroe's Brief of Respondent was initially due on December 28, 2020.

2. Based on ongoing settlement discussions, Renfroe moved to extend that deadline to January 27, 2021, and the Court granted Renfroe's motion.

3. Because those settlement discussions were still in progress, Renfroe moved to extend the deadline to file its brief to February 26, 2021, and the Court granted Renfroe's motion.

4. Renfroe and Petitioner National Labor Relations Board continue to engage in discussions to settle this matter and continue to make substantial progress toward reaching a settlement.

5. 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.

6. Although the parties continue to make progress toward settlement, given the complexity of any resolution of this matter, it appears that the parties are unlikely to conclude settlement negotiations by the current February 26, 2021 deadline despite diligent efforts. Moreover, if the parties' negotiations do conclude before the current deadline but do not produce a settlement, Renfroe will have insufficient time to prepare its Brief of Respondent.

7. Therefore, Renfroe requests an additional extension of the briefing deadline to allow the parties to continue settlement negotiations.

8. 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 March 29, 2021.

Respectfully submitted,

*s/ E. Travis Ramey*_____

E. Travis Ramey

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

OF COUNSEL

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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 314 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: February 19, 2021

No. 20-13027

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

CERTIFICATE OF SERVICE

I hereby certify that on February 19, 2021, 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:

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Assistant General Counsel
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Elizabeth A. Heaney
Joel Heller
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By Mail

Kimani Adams
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s/ E. Travis Ramey

OF COUNSEL