

**20-1197/20-1232**  
**Oral Argument Has Not Been Scheduled**

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**UNITED STATES COURT OF APPEALS**  
**FOR THE DISTRICT OF COLUMBIA**

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NAPLETON 1050, INC. D/B/A NAPLETON CADILLAC OF LIBERTYVILLE,  
*Petitioner,*

v.

NATIONAL RELATIONS LABOR BOARD,  
*Respondent.*

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**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 4, 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. On February 8, 2021, Petitioner filed an unopposed motion for a 30-day extension, because the parties' settlement negotiations had not concluded.
9. On February 10, 2021, this Court granted Petitioner's motion, and entered a clerk's order, setting the briefing schedule as follows: Petitioners' Brief due

March 12, 2021; Respondents' Brief due April 12, 2021; and Petitioners' Reply Brief due May 3, 2021.

10. The parties continue to work on settling this matter, and have made progress, but still need more time to come to a resolution.

11. 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: March 11, 2021

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**CERTIFICATE OF COMPLIANCE WITH TYPE VOLUME LIMIT,  
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 397 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 11th day of March, 2021.

/s/ Tae Y. Kim \_\_\_\_\_

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