

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

CHAMBER OF COMMERCE OF THE)
 UNITED STATES OF AMERICA,)
)
 and)
)
 COALITION FOR A DEMOCRATIC)
 WORKPLACE,)
)
)
 Plaintiffs,)
)
 v.)
)
 NATIONAL LABOR RELATIONS)
 BOARD)
)
)
 Defendant.)

Case No. 11-2262
Judge James E. Boasberg

PLAINTIFFS’ MOTION FOR SUMMARY JUDGMENT

Pursuant to Rule 56 of the Federal Rules of Civil Procedure, Plaintiffs Chamber of Commerce of the United States of America and Coalition for a Democratic Workplace, by and through undersigned counsel, respectfully move this Court to enter summary judgment in Plaintiffs’ favor. The grounds for this motion are set forth in the accompanying memorandum of points and authorities. In accordance with LCvR 7(c), a proposed Order is attached.

Dated: February 3, 2012

Respectfully submitted,

/s/ Howard M. Radzely

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