

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

**NOEL CANNING, A DIVISION OF
THE NOEL CORPORATION,**

Petitioner,

v.

**NATIONAL LABOR RELATIONS
BOARD,**

Respondent.

Case No. 12-1115

**MOTION FOR LEAVE TO FILE STATEMENT REGARDING THE
MOTION TO INTERVENE OF THE CHAMBER OF COMMERCE OF
THE UNITED STATES OF AMERICA AND THE COALITION FOR A
DEMOCRATIC WORKPLACE**

On March 15, 2012, The Chamber of Commerce of the United States of America (“Chamber”) filed a Motion for Leave to Intervene. On March 28, 2012, the National Labor Relations Board (“Board”) filed an Opposition to that Motion for Leave to Intervene. The Petitioner, Noel Canning, a Division of the Noel

Corporation, now seeks leave from the Court to file a short Statement Regarding
The Motion To Intervene.

Respectfully submitted this 18th day of April, 2012.

/s/ Gary E. Lofland

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CERTIFICATE OF SERVICE

I hereby certify that on the 18th day of April, 2012, I electronically filed the foregoing document entitled *Motion for Leave to File Statement Regarding the Motion to Intervene of the Chamber of Commerce of the United States of America and the Coalition and the Coalition for a Democratic Workplace* with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

National Labor Relations Board – Appellee

Linda Dreeben – @nlrb.gov

Jill Griffin – .griffin@nlrb.gov

Elizabeth Heaney – .heaney@nlrb.gov

IBT Local 760 – Intervenor

James B. Coppess – @aflcio.org

National Right to Work Legal Defense Foundation – Intervenor for Lugo, Richards, Yost, Gray, Medley, Fuentes, and Fuentes

William L. Messenger – @nrtw.org

John N. Raudabaugh – @nrtw.org

Chamber of Commerce of USA and

The Coalition for a Democratic Workplace – Intervenor

Roger King – @jonesday.com

Noel J. Francisco – @jonesday.com

Date: April 18, 2012

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