

**U.S. District Court
District of Columbia (Washington, DC)
CIVIL DOCKET FOR CASE #: 1:23-cv-02084-RBW**

PROTECT THE PUBLIC'S TRUST v. NATIONAL LABOR
RELATIONS BOARD
Assigned to: Judge Reggie B. Walton
Cause: 05:552 Freedom of Information Act

Date Filed: 07/18/2023
Jury Demand: None
Nature of Suit: 895 Freedom of
Information Act
Jurisdiction: U.S. Government Defendant

Plaintiff**PROTECT THE PUBLIC'S TRUST**

represented by **Gary Lawkowski**
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ATTORNEY TO BE NOTICED

V.

Defendant**NATIONAL LABOR RELATIONS
BOARD**

represented by **Dawn Laura Goldstein**
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Date Filed	#	Docket Text
07/18/2023	<u>1</u>	COMPLAINT against NATIONAL LABOR RELATIONS BOARD (Filing fee \$ 402 receipt number ADCDC-10215142) filed by PROTECT THE PUBLIC'S TRUST. (Attachments: # <u>1</u> Exhibit Exhibit A – FOIA Request, # <u>2</u> Exhibit Exhibit B – Agency Response Letter, # <u>3</u> Exhibit Exhibit C – Plaintiff's Appeal, # <u>4</u> Exhibit Exhibit D – NLRB Appeal Response, # <u>5</u> Exhibit Exhibit E – Oct 13 Memo, # <u>6</u> Civil Cover Sheet Civil Cover Sheet, # <u>7</u> Summons Summons – U.S. Attorney's Office, # <u>8</u> Summons Summons – US Attorney General, # <u>9</u> Summons Summons – Agency General Counsel)(Lawkowski, Gary) (Entered: 07/18/2023)

07/18/2023	<u>2</u>	LCvR 26.1 CERTIFICATE OF DISCLOSURE of Corporate Affiliations and Financial Interests by PROTECT THE PUBLIC'S TRUST (Lawkowski, Gary) (Entered: 07/18/2023)
07/19/2023		Case Assigned to Judge Reggie B. Walton. (zrtw) (Entered: 07/19/2023)
07/19/2023	<u>3</u>	SUMMONS (3) Issued Electronically as to NATIONAL LABOR RELATIONS BOARD, U.S. Attorney and U.S. Attorney General (Attachments: # <u>1</u> Notice and Consent)(zrtw) (Entered: 07/19/2023)
08/09/2023	<u>4</u>	ENTERED IN ERROR.....NOTICE of Appearance by Theresa A. Westover on behalf of NATIONAL LABOR RELATIONS BOARD (Westover, Theresa) Modified on 8/9/2023 to enter in error; correct document filed at DE <u>5</u> .(ztnr) (Entered: 08/09/2023)
08/09/2023	<u>5</u>	NOTICE of Appearance by Theresa A. Westover on behalf of NATIONAL LABOR RELATIONS BOARD (Westover, Theresa) (Entered: 08/09/2023)
08/09/2023	<u>6</u>	GENERAL ORDER FOR CIVIL CASES BEFORE THE HONORABLE REGGIE B. WALTON. Signed by Judge Reggie B. Walton on August 9, 2023. (lcrbw2) (Entered: 08/09/2023)
08/17/2023	<u>7</u>	ANSWER to Complaint by NATIONAL LABOR RELATIONS BOARD.(Westover, Theresa) (Entered: 08/17/2023)
08/21/2023		MINUTE ORDER. To ensure the expeditious resolution of this action, and because this qualifies as an exempted case under Local Civil Rule 16.3(b), it is hereby ORDERED that, on or before September 18, 2023, the parties shall file a joint proposed briefing schedule governing further proceedings. Signed by Judge Reggie B. Walton on August 21, 2023. (lcrbw2) (Entered: 08/21/2023)
08/29/2023	<u>8</u>	NOTICE of Appearance by Dawn Laura Goldstein on behalf of All Defendants (Goldstein, Dawn) (Main Document 8 replaced on 8/29/2023) (zed). (Entered: 08/29/2023)
09/18/2023	<u>9</u>	PROPOSED BRIEFING SCHEDULE by PROTECT THE PUBLIC'S TRUST. (Lawkowski, Gary) (Entered: 09/18/2023)
09/18/2023	<u>10</u>	ORDER. In accordance with the attached Order, it is hereby ORDERED that, on or before November 6, 2023, the defendant shall file its motion for summary judgment. It is further ORDERED that, on or before December 4, 2023, the plaintiff shall file its combined opposition to the defendant's motion for summary judgment and cross-motion for summary judgment. It is further ORDERED that, on or before January 8, 2024, the defendant shall file its combined opposition to the plaintiff's cross-motion for summary judgment and a reply in support of its motion for summary judgment. It is further ORDERED that, on or before February 2, 2024, the plaintiff shall file a reply in support of its cross-motion for summary judgment. It is further ORDERED that, on May 2, 2024, at 9:00 a.m., the parties shall appear before the Court for a status conference, via teleconference, by calling 1-877-873-8017 and entering the Court's access code (8583213) followed by the pound key (#). This status conference will serve as a target date for the resolution of the parties' summary judgment motions. Signed by Judge Reggie B. Walton on September 18, 2023. (lcrbw2) (Entered: 09/18/2023)
11/06/2023	<u>11</u>	MOTION for Summary Judgment <i>Statement of Points and Authorities and Statement of Undisputed Material Facts</i> by NATIONAL LABOR RELATIONS BOARD. (Attachments: # <u>1</u> Exhibit Defendant's Index of Exhibits, # <u>2</u> Declaration Declaration of Lori Ketcham, # <u>3</u> Exhibit Ketcham Exhibit 1, # <u>4</u> Declaration Declaration of Nancy E. Kessler Platt, # <u>5</u> Exhibit Platt Exhibit 1, # <u>6</u> Exhibit Platt Exhibit 2, # <u>7</u> Exhibit Platt Exhibit 3, # <u>8</u> Exhibit Platt Exhibit 4, # <u>9</u> Text of Proposed Order Defendant's Proposed Order)(Westover, Theresa) (Entered: 11/06/2023)
12/04/2023	<u>12</u>	Cross MOTION for Summary Judgment by PROTECT THE PUBLIC'S TRUST. (Attachments: # <u>1</u> Memorandum in Support Statement and Points of Authority, # <u>2</u> Exhibit Exhibit A – Nov 5 Letter, # <u>3</u> Statement of Facts Plaintiff's Statement of Facts, # <u>4</u> Statement of Facts Response to Defendant's Statement of Facts, # <u>5</u> Text of Proposed Order Proposed Order)(Lawkowski, Gary) (Entered: 12/04/2023)

12/04/2023	<u>13</u>	RESPONSE re <u>11</u> MOTION for Summary Judgment <i>Statement of Points and Authorities and Statement of Undisputed Material Facts</i> filed by PROTECT THE PUBLIC'S TRUST. (Attachments: # <u>1</u> Memorandum in Support Statement and Points of Authority, # <u>2</u> Exhibit Exhibit A – Nov 5 Letter, # <u>3</u> Statement of Facts Plaintiff's Statement of Facts, # <u>4</u> Statement of Facts Response to Defendant's Statement of Facts, # <u>5</u> Text of Proposed Order Proposed Order)(Lawkowski, Gary) (Entered: 12/04/2023)
01/08/2024	<u>14</u>	Memorandum in opposition to re <u>12</u> Motion for Summary Judgment, filed by NATIONAL LABOR RELATIONS BOARD. (Attachments: # <u>1</u> Statement of Facts Defendant's Opposition to Plaintiff's Undisputed Material Facts)(Westover, Theresa) (Entered: 01/08/2024)
01/08/2024	<u>15</u>	REPLY to opposition to motion re <u>11</u> MOTION for Summary Judgment <i>Statement of Points and Authorities and Statement of Undisputed Material Facts</i> filed by NATIONAL LABOR RELATIONS BOARD. (Attachments: # <u>1</u> Statement of Facts Defendant's Opposition to Plaintiff's Undisputed Material Facts)(Westover, Theresa) (Entered: 01/08/2024)
02/02/2024	<u>16</u>	REPLY to opposition to motion re <u>12</u> Cross MOTION for Summary Judgment filed by PROTECT THE PUBLIC'S TRUST. (Attachments: # <u>1</u> Statement of Facts Corrected Response to Defendant's Statement of Allegedly Material Facts)(Lawkowski, Gary) (Entered: 02/02/2024)
04/26/2024		MINUTE ORDER. The Court requiring additional time to consider the pending cross-motions for summary judgment in this case, it is hereby ORDERED that the status conference currently scheduled for May 2, 2024, is CONTINUED to August 2, 2024, at 9:00 a.m. The parties shall appear before the Court, via teleconference, by calling 1-877-873-8017 and entering the Court's access code (8583213) followed by the pound key (#). This status conference will serve as a target date for the resolution of the pending motions in this case. In the event that the Court is unable to resolve the motions by this date, the parties will be advised in advance that the status conference will be continued to a later date. Signed by Judge Reggie B. Walton on April 26, 2024. (lcrbw2) (Entered: 04/26/2024)
06/28/2024		MINUTE ORDER. Due to a change in the Court's calendar, it is hereby ORDERED that the status conference currently scheduled for August 2, 2024, is CONTINUED to August 5, 2024, at 9:00 a.m. Signed by Judge Reggie B. Walton on June 28, 2024. (lcrbw2) (Entered: 06/28/2024)
07/30/2024		MINUTE ORDER. The Court requiring additional time to consider the pending cross-motions for summary judgment in this case, it is hereby ORDERED that the status conference currently scheduled for August 5, 2024, is CONTINUED to October 28, 2024, at 9:00 a.m. The parties shall appear before the Court via teleconference, by calling 1-877-873-8017 and entering the Court's access code (8583213) followed by the pound key (#). This status conference will serve as a target date for the resolution of the pending motions in this case. In the event that the Court is unable to resolve the motion by this date, the parties will be advised in advance that the status conference will be continued to a later date. Signed by Judge Reggie B. Walton on July 30, 2024. (lcrbw2) (Entered: 07/30/2024)