

UNITED STATES OF AMERICA  
NATIONAL LABOR RELATIONS BOARD  
REGION 28

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WORKERS UNITED,

28-RC-286556

Petitioner

**EMERGENCY MOTION FOR  
EXPEDITED CONSIDERATION  
OF REQUEST FOR REVIEW  
PURSUANT TO BOARD'S  
RULES AND REGULATIONS  
§ 102.67(j)**

-and-

STARBUCKS CORPORATION,

Employer.  
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Petitioner Workers United hereby moves for expedited consideration of Starbucks' Request for Review. The ballots from a mail ballot election are scheduled to be opened tomorrow, February 16. However, under Board's Rules and Regulations, §102.67(c), Starbucks' Request for Review will block the ballots' opening until the Board rules upon Starbucks' request. Starbucks' request is frivolous because it is based on facts almost identical to those upon which the Board denied review in Cases 03-RC-282115, 03-RC-282127, 03-RC-282139, 2021 WL 5848184 (Dec. 7, 2021). Nonetheless, the employees are expecting a vote count tomorrow. They will likely be demoralized and will assume that Starbucks' controls the Board's processes, unless the ballots are counted as scheduled.

Dated: Buffalo, NY  
February 15, 2022

/s/ Ian Hayes  
Ian Hayes, Esq.

**CERTIFICATE OF SERVICE**

I hereby certify that on February 15, 2022, I submitted the foregoing **EMERGENCY MOTION FOR EXPEDITED CONSIDERATION OF REQUEST FOR REVIEW PURSUANT TO BOARD'S RULES AND REGULATIONS § 102.67(j)** to the Board's Executive Secretary via the NLRB e-filing system, and served a copy of the same on the following via e-mail:

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