

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MICHIGAN

**ELIZABETH K. KERWIN, Regional  
Director, Seventh Region of the  
National Labor Relations Board,  
for and on behalf of the  
NATIONAL LABOR RELATIONS  
BOARD,**

Petitioner,

v.

**STARBUCKS CORPORATION,**

Respondent.

Case No. 2:22-cv-12761

Judge Mark A. Goldsmith

Hon. Mag. Elizabeth A. Stafford

**RESPONDENT STARBUCKS  
CORPORATION'S PARTIAL  
OPPOSITION TO MOTION OF  
WORKERS UNITED FOR LEAVE  
TO APPEAR AS AMICUS  
CURIAE**

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1. On December 8, 2022, Workers United (the “Union”) filed a Motion for Leave to Appear as Amicus Curiae (“the Motion”) seeking the Court’s permission “to participate in oral argument at any hearings, to file brief (if it believes that doing so would be of aid to the Court), and to examine witnesses during any hearings.” (Dkt. 9, PageID 105).

2. Respondent Starbucks Corporation partially opposes the Motion to the extent the Union seeks permission to examine witnesses at hearing because the Union’s requested level of participation goes far beyond the traditional and well-accepted limitations on the role of an amicus curiae. The Court should limit the Union’s amicus participation (if any) to briefing and oral argument only.

Respectfully submitted,

*/s/Neil B. Pioch*

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DATED: December 21, 2022

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**MEMORANDUM BRIEF IN  
SUPPORT OF RESPONDENT  
STARBUCKS CORPORATION'S  
PARTIAL OPPOSITION TO  
MOTION OF WORKERS UNITED  
FOR LEAVE TO APPEAR AS  
AMICUS CURIAE**

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