

**UNITED STATES COURT OF APPEALS  
FOR THE SIXTH CIRCUIT**

AARON ABADI,	:	
Petitioner,	:	
	:	
v.	:	Case No. 21-4133
	:	
OCCUPATIONAL SAFETY &	:	
HEALTH (“OSHA”)	:	
Respondent.	:	

PETITIONER’S REPLY TO RESPONSE TO  
EMERGENCY MOTION TO STAY

Respondent says, “Although styled as a stay motion, Mr. Abadi’s motion in substance appears to be a petition for panel rehearing...” That is not true.

Plaintiff submitted a motion initially in the second circuit. That motion traveled here to the sixth circuit and eventually was denied, specifically because it was MOOT. It was moot because there was a stay from the fifth circuit. (See doc 33-2)

Now that that STAY was dissolved, the motion is no longer moot. My motion should therefore be addressed.

WHEREFORE, I request the Court to grant the emergency motion.

Respectfully submitted this 28<sup>th</sup> day of December 2021.

s/Aaron Abadi

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CERTIFICATE OF SERVICE

This reply is being filed by the court clerk through Electronic Case Filing (CM/ECF), and therefore all attorneys for Respondent received this immediately upon filing.

CERTIFICATE OF COMPLIANCE

This reply complies with the limit of 5,200 words established by FRAP 27(d)(2) because it contains 226 words as measured by Microsoft Word excluding sections not counted pursuant to FRAP 32(f).

s/Aaron Abadi

Aaron Abadi, petitioner