



United States Government

NATIONAL LABOR RELATIONS BOARD

OFFICE OF THE GENERAL COUNSEL

Washington, D.C. 20570

March 4, 2015

Deborah S. Hunt, Esquire
Clerk United States Court of
Appeals For The Sixth Circuit
540 Potter Stewart U.S. Courthouse
100 East Fifth Street
Cincinnati, OH 45202-3988

Re: *NLRB v. The Avenue Care and Rehabilitation Center*
Board Case No. 08-CA-094941

Dear Ms. Hunt:

I am enclosing an original and four copies of the National Labor Relations Board's application for enforcement of its order in this case. Within 40 days of the Court's docketing of this application, I will file the agency record and a certified list of its contents.

Please serve a copy of this application on the Respondent, The Avenue Care and Rehabilitation Center, whose address appears on the service list. I have served a copy of the application on each party admitted to participate in the Board proceedings, and their names and addresses also appear on the service list.

I am counsel of record for the Board, and all correspondence should be addressed to me. I would appreciate your furnishing the Board's Regional Director, whose name and address also appear on the service list, with a copy of

any correspondence the Court sends to counsel in this case. The Board attorneys directly responsible for this case are Kira Vol (202) 273-0656 and Marni von Wilpert (202) 273-2903.

Very truly yours,



Linda Dreeben

Deputy Associate General Counsel

NATIONAL LABOR RELATIONS BOARD

1099 14th Street, N.W.

Washington, D.C. 20570

(202) 273-2960

Encls.

Robert C. Pivonka, Esq.

Frederick Englehart, Esq.

SERVICE LIST

NLRB v. The Avenue and Rehabilitation Center
Board Case No. 08-CA-094941

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Respondent's Counsel

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The Avenue Care and Rehabilitation
Center
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Respondent

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SEIU District 1199, The Healthcare and
Social Service Union
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Charging Party

Allen Binstock
NLRB-Region 8
1240 East 9th Street, Room 1695
Cleveland, OH 44199-2086

Regional Director

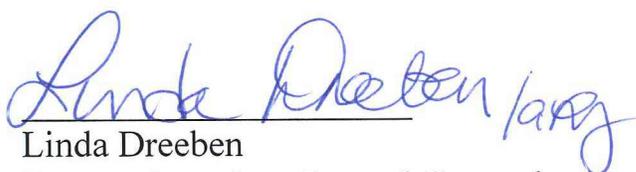
UNITED STATES COURT OF APPEALS
FOR THE SIXTH CIRCUIT

NATIONAL LABOR RELATIONS)
BOARD)
) Petitioner)
))
) v.)
))
THE AVENUE CARE AND)
REHABILITATION CENTER)
) Respondent)

APPLICATION FOR ENFORCEMENT
OF AN ORDER OF THE
NATIONAL LABOR RELATIONS BOARD

The National Labor Relations Board hereby applies to the Court for enforcement of its Order issued against The Avenue Care and Rehabilitation Center on January 24, 2014, in Board Case No. 08-CA-094941, reported at 360 NLRB No. 24. The Board seeks enforcement of its Order in full.

The Court has jurisdiction over this application pursuant to Section 10(e) of the National Labor Relations Act, as amended (29 U.S.C. § 151, 160(e)). Venue is proper in this Circuit because the unfair labor practice occurred in Warrensville Heights, Ohio.



Linda Dreeben
Deputy Associate General Counsel
NATIONAL LABOR RELATIONS BOARD
1099 14th Street, N.W.
Washington, D.C. 20570
(202) 273-2960

Dated at Washington, D.C.
this 4th day of March 2015

UNITED STATES COURT OF APPEALS
FOR THE SIXTH CIRCUIT

NATIONAL LABOR RELATIONS)
BOARD)
) Petitioner)
))
) v.)
))
THE AVENUE CARE AND)
REHABILITATION CENTER)
) Respondent)

CERTIFICATE OF SERVICE

The undersigned certifies that one copy of the Board's application for enforcement of its order in this case is being served today by UPS next day air mail upon the following counsel:

Robert C. Pivonka, Esquire
Frederick Englehart, Esquire
Rolf & Goffman Co., L.P.A.
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Linda Dreeben
Deputy Associate General Counsel
NATIONAL LABOR RELATIONS BOARD
1099 14th Street, N.W.
Washington, D.C. 20570

Dated at Washington, D.C.
this 4th day of March 2015