



United States Government

**NATIONAL LABOR RELATIONS BOARD**

**OFFICE OF THE GENERAL COUNSEL**

Washington, D.C. 20570

May 12, 2015

Deborah S. Hunt, Clerk  
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. JAG Healthcare, Inc. d/b/a Galion  
Pointe, LLC  
Board Case Nos. 08-CA-039029, 08-CA-  
039112, and 08-CA-039133

Dear Ms. Hunt:

I am enclosing an original and five 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, JAG Healthcare, Inc. d/b/a Galion Pointe, LLC, 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 Elizabeth Heaney (202) 273-1743 and David Seid (202) 273-2941.

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.

SERVICE LIST

NLRB v. JAG Healthcare, Inc. d/b/a Galion Pointe, LLC  
Board Case Nos. 08-CA-039029, 08-CA-039112, and 08-CA-039133

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Respondent's Counsel

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Galion, OH 44833-1535

Respondent

JAG Healthcare, Inc.  
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Respondent

Service Employees International Union  
1199 WV/KY/OH  
Attn: Frank J. Hornick, Director Ohio  
Care Division/SEIU  
1771 E 30<sup>th</sup> Street  
Cleveland, OH 44114-4407

Charging Party

SEIU/District 1199, The Health Care  
and Social Service Union  
Attn: Sheronda Johnson  
1771 East 30<sup>th</sup> Street  
Cleveland, OH 44114-4407

(Interested Party)

Service Employees International Union,  
Local 1199  
Attn: Kathy McCormick  
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(Interested Party)

Allen Binstock  
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Regional Director

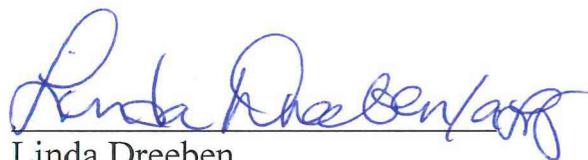
UNITED STATES COURT OF APPEALS  
FOR THE SIXTH CIRCUIT

NATIONAL LABOR RELATIONS )  
BOARD )  
                                  ) Petitioner )  
                                  ) )  
                                  ) v. )  
                                  ) )  
JAG HEALTHCARE, INC. d/b/a )  
GALION POINTE, LLC )  
                                  ) 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 JAG Healthcare, Inc. d/b/a Galion Pointe, LLC on December 15, 2014, in Board Case Nos. 08-CA-039029, 08-CA-039112, and 08-CA-039133, reported at 361 NLRB No. 135. 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 Galion, Ohio.



Linda Dreeben  
Deputy Associate General Counsel  
NATIONAL LABOR RELATIONS BOARD  
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(202) 273-2960

Dated at Washington, D.C.  
this 12<sup>th</sup> day of May 2015

