



United States Government

NATIONAL LABOR RELATIONS BOARD

OFFICE OF THE GENERAL COUNSEL

Washington, D.C. 20570

June 25, 2015

Marcia M. Waldron, Esquire
Clerk, United States Court of Appeals
for the Third Circuit
21400 United States Courthouse
601 Market Street
Philadelphia, PA 19106-1790

Re: NLRB v. FedEx Freight, Inc.
Board Case No. 22-CA-146653

Dear Ms. Waldron:

I am enclosing an original and three 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, FedEx Freight, Inc., 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 Julie Broido (202) 273-2996 and Michael Hickson (202) 273-2985.

Very truly yours,



Linda Dreeben

Deputy Associate General Counsel

NATIONAL LABOR RELATIONS BOARD

1015 Half Street, SE

Washington, D.C. 20570

(202) 273-2960

Encls.

SERVICE LIST

NLRB v. FedEx Freight, Inc.
Board Case No. 22-CA-146653

Justin B. Cutlip, Esquire
Jackson Lewis, P.C.
220 Headquarters Plaza 7th Floor
Morristown, NJ 07960
cutlipj@jacksonlewis.com

Respondent's Counsel

FedEx Freight, Inc.
Attn: Marty Underwood, Terminal Manager
9 Distribution Way
Monmouth Junction, NJ 08852

Respondent

Paul Montalbano, Esquire
Cohen, Leder, Montalbano & Grossman, LLC
1700 Galloping Hill Road
Kenilworth, NJ 07033

Charging Party's Counsel

Local 701, International
Brotherhood of Teamsters
2003 U.S. Highway 130 Suite B
North Brunswick, NJ 08902

Charging Party

David E. Leach, III
NLRB Region 22
20 Washington Place, 5th Floor
Newark, NJ 07102

Regional Director

UNITED STATES COURT OF APPEALS
FOR THE THIRD CIRCUIT

NATIONAL LABOR RELATIONS)
BOARD)
) Petitioner)
))
) v.)
))
FEDEX FREIGHT, INC.)
) 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 FedEx Freight, Inc. on May 19, 2015, in Board Case No. 22-CA-146653, reported at 362 NLRB No. 91. 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 Monmouth Junction, New Jersey.



Linda Dreeben
Deputy Associate General Counsel
NATIONAL LABOR RELATIONS BOARD
1015 Half Street, SE
Washington, D.C. 20570
(202) 273-2960

Dated at Washington, D.C.
this 25th day of June 2015

UNITED STATES COURT OF APPEALS
FOR THE THIRD CIRCUIT

NATIONAL LABOR RELATIONS)
BOARD)
) Petitioner)
))
) v.)
))
FEDEX FREIGHT, INC.)
) 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 mail upon the following counsel:

Justin B. Cutlip, Esquire
Jackson Lewis, P.C.
220 Headquarters Plaza 7th Floor
Morristown, NJ 07960
cutlipj@jacksonlewis.com



Linda Dreeben
Deputy Associate General Counsel
NATIONAL LABOR RELATIONS BOARD
1015 Half Street, SE
Washington, D.C. 20570

Dated at Washington, D.C.
this 25th day of June 2015