

UNITED STATES COURT OF APPEALS  
FOR THE EIGHTH CIRCUIT

NATIONAL LABOR RELATIONS BOARD	)	
	)	
Petitioner	)	No. 16-1550
	)	
v.	)	Board Case Nos.
	)	18-CA-092542,
ST. FRANCIS REGIONAL MEDICAL CENTER	)	18-CA-094066
	)	
Respondent	)	

**JOINT MOTION TO VOLUNTARILY DISMISS,  
WITH PREJUDICE, THE APPLICATION FOR ENFORCEMENT**

To the Honorable, the Judges of the United States  
Court of Appeals for the Eighth Circuit:

Pursuant to Federal Rule of Appellate Procedure 42(b), the National Labor Relations Board (“the Board”), by its Deputy Associate General Counsel, and St. Francis Regional Medical Center (“the Hospital”), by its counsel, respectfully move the Court for leave to voluntarily dismiss with prejudice the application for enforcement, and show:

1. On February 29, 2016, the Board filed with the Court an application for enforcement of its Order in the above-captioned case. The record has not been filed yet in the case.

2. The parties have reached a resolution in this case that is satisfactory to the Board.

3. The Hospital and the Board, therefore, request that this Court dismiss with prejudice the Board's application for enforcement.

4. Each side is to bear its own costs.

5. Paul J. Zech, Esq., counsel for the Hospital, has given the Board permission to sign this motion on his behalf.

WHEREFORE, the parties respectfully request that their joint motion be granted, and that the application for enforcement be dismissed with prejudice.

For the Board: /s/ Linda Dreeben  
Linda Dreeben, Esq.  
Assistant General Counsel  
NATIONAL LABOR RELATIONS BOARD  
1015 Half St., SE  
Washington, DC 20570  
(202) 273-2960

Dated: March 23, 2016

For the Hospital: /s/ Paul J. Zech  
Paul J. Zech, Esq.  
Felhaber Larson Fenlon & Vogt, P.A.  
220 South Sixth Street, Suite 2200  
Minneapolis, MN 55402-4504

Dated: March 23, 2016

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**CERTIFICATE OF SERVICE**

I hereby certify that on March 23, 2016, I electronically filed the foregoing document with the Clerk of the Court for the United States Court of Appeals for the Eighth Circuit by using the CM/ECF system. I certify that the foregoing document was served on all parties or their counsel of record through the appellate CM/ECF system.

/s/ Linda Dreeben  
Linda Dreeben  
Deputy Associate General Counsel  
National Labor Relations Board  
1099 14th Street, NW  
Washington, DC 20570  
(202) 273-2960

Dated at Washington, DC  
this 23rd day of March 2016