



United States Government

NATIONAL LABOR RELATIONS BOARD

OFFICE OF THE GENERAL COUNSEL

Washington, D.C. 20570

April 13, 2016

Lyle W. Cayce
Clerk of the Court
United States Court of Appeals
for the Fifth Circuit
600 Camp Street, Room 102
U.S. Court of Appeals Courthouse
New Orleans, LA 70130

Re: *RGIS, LLC v. NLRB*
5th Cir. No. 16-60129
Board Case No. 28-CA-136313

Dear Mr. Cayce:

I am enclosing an original and five copies of the National Labor Relations Board's cross-application for enforcement of its order in this case.

Please serve a copy of the cross-application on the Petitioner, RGIS, LLC, whose address appears on the service list. I have served a copy of the cross-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 Dellinger Vol, (202) 273-0656 and Jared D. Cantor, (202) 273-0016.

Very truly yours,

A handwritten signature in black ink, appearing to read "Linda Dreeben". The signature is written in a cursive style with a large, stylized initial "L".

Linda Dreeben
Deputy Associate General Counsel
NATIONAL LABOR RELATIONS BOARD
1015 Half Street, S.E.
Washington, DC 20570
(202) 273-2960

Encls.

SERVICE LIST

RGIS, LLC. v. NLRB
Board Case Number: 28-CA-136313

Kerry S. Martin, Esq. Petitioner's Counsel
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RGIS, LLC Petitioner
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Phoenix, AZ 85063

Martha Kinard Regional Director
NLRB Region 16
819 Taylor Street, Room 8A24
Fort Worth, TX 76102-6178

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

RGIS, LLC)	
)	
Petitioner)	
)	
v.)	No. 16-60129
)	
NATIONAL LABOR RELATIONS BOARD)	
)	
Respondent)	
)	

**CROSS-APPLICATION FOR ENFORCEMENT
OF AN ORDER OF THE
NATIONAL LABOR RELATIONS BOARD**

The National Labor Relations Board hereby cross-applies to the Court for enforcement of its Order issued against RGIS, LLC, on February 23, 2016, in Board Case No. 28-CA-136313, reported at 363 NLRB No. 132. On March 3, 2016, the Petitioner, RGIS, LLC, filed a petition with this Court to review the same Board order. The Board seeks enforcement of its Order in full.

The Court has jurisdiction over this cross-application pursuant to Section 10(e) and (f) of the National Labor Relations Act, as amended (29 U.S.C. § 160(e) and (f)), because the Petitioner is aggrieved by the Board's order. Venue is proper in this Circuit because the Petitioner transacts business within the geographic boundaries of this Circuit.


Linda Dreeben
Deputy Associate General Counsel
NATIONAL LABOR RELATIONS BOARD
1015 Half Street, S.E.
Washington, DC 20570
(202) 273-2960

Dated at Washington, D.C.
this 13th day of April, 2016

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

RGIS, LLC)	
)	
Petitioner)	
)	
v.)	No. 16-60129
)	
NATIONAL LABOR RELATIONS BOARD)	
)	
Respondent)	
)	

CERTIFICATE OF SERVICE

I hereby certify that on April 13, 2016, I electronically filed the foregoing document with the Clerk of the Court for the United States Court of Appeals for the Fifth Circuit by using the CM/ECF system. I certify that the foregoing document will be served via the CM/ECF system on the following counsel, who are registered CM/ECF users:

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/s/ Linda Dreeben
Linda Dreeben
Deputy Associate General Counsel
NATIONAL LABOR RELATIONS BOARD
1015 Half Street, S.E.
Washington, DC 20570

Dated at Washington, D.C.
this 13th day of April, 2016