



United States Government

**NATIONAL LABOR RELATIONS BOARD**  
**OFFICE OF THE GENERAL COUNSEL**

Washington, D.C. 20570

July 21, 2017

Ms. Catherine O'Hagan Wolfe  
Clerk of the Court  
U.S. Court of Appeals for the 2nd Circuit  
Thurgood Marshall U.S. Courthouse  
40 Foley Square  
New York, NY 10007

Re: *NLRB v. Deep Distributors of Greater NY d/b/a  
The Imperial Sales, Inc.*, Board Case Nos. 29-CA-147909 and  
29-CA-157108

Dear Ms. Wolfe:

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, Deep Distributors of Greater NY d/b/a The Imperial Sales, 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 Joel Heller (202) 273-1042 and Usha Dheenani (202) 273-2948.

Very truly yours,

/s/ Linda Dreeben

Linda Dreeben

Deputy Associate General Counsel

NATIONAL LABOR RELATIONS BOARD

1015 Half Street SE

Washington, DC 20570

(202) 273-2960

Enclosures

## SERVICE LIST

*NLRB v. Deep Distributors of Greater NY d/b/a  
The Imperial Sales, Inc.*  
Board Case No. 29-CA-147909 and 29-CA-157108

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National Labor Relations Board  
Region 29  
Two Metro Tech Center  
Suite 5100  
100 Myrtle Ave.  
Brooklyn, NY 11201

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

NATIONAL LABOR RELATIONS BOARD	)	
	)	
Petitioner	)	
	)	
v.	)	Board Case Nos.
	)	29-CA-147909
	)	29-CA-157108
DEEP DISTRIBUTORS OF GREATER NY	)	
d/b/a THE IMPERIAL SALES, 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 Deep Distributors of Greater NY d/b/a The Imperial Sales, Inc., on June 20, 2017, in Board Case Nos. 29-CA-147909 and 29-CA-157108, reported at 365 NLRB No. 95. 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 practices occurred in Bethpage, New York.

/s/ Linda Dreeben  
Linda Dreeben  
Deputy Associate General Counsel  
NATIONAL LABOR RELATIONS BOARD  
1015 Half Street SE  
Washington, DC 20570  
(202) 273-2960

Dated at Washington, DC  
this 21st day of July, 2017

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

NATIONAL LABOR RELATIONS BOARD	)	
	)	
Petitioner	)	
	)	
v.	)	Board Case Nos.
	)	29-CA-147909
DEEP DISTRIBUTORS OF GREATER NY	)	29-CA-157108
d/b/a THE IMPERIAL SALES, 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 e-mail upon the following counsel:

SAUL D. ZABELL, ESQ.  
ZABELL & ASSOCIATES, PC  
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/s/ Linda Dreeben  
Linda Dreeben  
Deputy Associate General Counsel  
NATIONAL LABOR RELATIONS BOARD  
1015 Half Street SE  
Washington, DC 20570

Dated at Washington, DC  
this 21st day of July, 2017