



United States Government

NATIONAL LABOR RELATIONS BOARD

OFFICE OF THE GENERAL COUNSEL

Washington, D.C. 20570

April 6, 2018

Molly Dwyer, Clerk
United States Court of Appeals
for the Ninth Circuit
Post Office Box 193939
San Francisco, CA 94119-3939

Re: *NLRB v. Rainbow Medical Transportation, LLC*
Board Case No. 28-CA-166617

Dear Ms. Dwyer:

I am electronically filing a copy 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 certified list of the contents of the agency record.

Please serve a copy of this application on the Respondent, Rainbow Medical Transportation, 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 Julie Broido (202) 273-2996 and Samuel Cretcher (202) 840-7259.

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

Encls.

SERVICE LIST

NLRB v. Rainbow Medical Transportation, LLC
Board Case No. 28-CA-166617

Ernest Collins Jr., Esquire
The Collins Law Firm, PLLC
1910 South Stapley Drive, Suite 221
Mesa, AZ 85204-6680
ecollins@thecollinslaw.com

Respondent's Counsel

Hane Sayed, Owner
Rainbow Medical Transport, LLC
165 West Hopi Drive, Suite 2
Holbrook, AZ 86025

Respondent

Mr. Henleigh Koyawena
P.O. Box 295
Second Mesa, AZ 86043-0295

Charging Party

Cornele A. Overstreet
NLRB Region 28
2600 North Central Avenue, Suite 1400
Phoenix, AZ 85004-3099

Regional Director

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

NATIONAL LABOR RELATIONS BOARD)	
)	
)	
Petitioner)	
)	
v.)	Board Case No.
)	28-CA-166617
RAINBOW MEDICAL TRANSPORTATION, 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 Rainbow Medical Transportation, LLC, on May 18, 2017, in Board Case No. 28-CA-166617, reported at 365 NLRB No. 80. 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 Holbrook and Tempe, Arizona.

/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 6th day of April 2018

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

NATIONAL LABOR RELATIONS BOARD)	
)	
)	
Petitioner)	
)	
v.)	Board Case No.
)	28-CA-166617
RAINBOW MEDICAL TRANSPORTATION, LLC)	
)	
)	
Respondent)	

CERTIFICATE OF SERVICE

I hereby certify that on April 6, 2018, I electronically filed the foregoing document with the Clerk of the Court for the United States Court of Appeals for the Ninth 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 or, if they are not, by serving a true and correct copy at the addresses listed below:

|

Ernest Collins Jr., Esquire
The Collins Law Firm, PLLC
1910 South Stapley Drive, Suite 221
Mesa, AZ 85204-6680
ecollins@thecollinslaw.com

/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 6th day of April 2018