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

NATIONAL LABOR RELATIONS)	
BOARD)	No. 18-70981
)	
Petitioner)	
v.)	Board Case No.
)	28-CA-166617
RAINBOW MEDICAL)	
TRANSPORATION LLC)	
)	
Respondent)	

**ANSWER TO APPLICATION FOR ENFORCEMENT
OF AN ORDER OF THE
NATIONAL LABOR RELATIONS BOARD**

Respondent Rainbow Medical Transportation LLC answers the National Labor Relations Board’s Application for enforcement of its Order issued against Rainbow Medical Transportation, LLC on May 18, 2018 in Board Case No. 28-CA-166617, reported at 365 NLRB No. 80. Rainbow Medical Transportation LLC has complied with all aspects of the Order except for the payment of lost earnings and other benefits, including adverse tax implications. The calculated loss earnings, as calculated by NLRB are unreasonable, greatly exceed the actual wage loss of employee and greatly exceed the fair market value of an employee in the same industry performing the same job.

The Court has jurisdiction over this matter 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 events occurred in Holbrook and Tempe, Arizona.

DATED this 16th day of May, 2018.

THE COLLINS LAW FIRM, PLLC

/s/ Ernest Collins Jr.
Ernest Collins, Jr.
1910 S. Stapley Dr., Ste. 221
Mesa, Arizona 85204
Attorney for Respondent

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RAINBOW MEDICAL)	
TRANSPORATION LLC)	
)	
Respondent)	

CERTIFICATE OF SERVICE

I hereby certify that on May 16, 2018, I electronically filed the foregoing document with the Clerk of 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 CM/ECF users or, if they are not, by serving a true and correct copy of at the address listed below:

Sam Cretcher
Honors Attorney
Appellate and Supreme Court Litigation Branch
National Labor Relations Board
1015 Half Street SE, Washington, DC 20003

DATED this 16th day of May, 2018.

THE COLLINS LAW FIRM, PLLC

/s/ Ernest Collins Jr.
Ernest Collins, Jr.
1910 S. Stapley Dr., Ste. 221
Mesa, Arizona 85204
Attorney for Respondent