

**UNITED STATES COURT OF APPEALS
FOR THE DISTRICT OF COLUMBIA CIRCUIT**

**NATIONAL LABOR RELATIONS
BOARD**

Petitioner

v.

TITO CONTRACTORS, INC.

Respondent

Appeal No.: 18-1119

Consolidated with 18-1107

RESPONSE TO APPLICATION FOR ENFORCEMENT

Pursuant to Federal Rule of Appellate Procedure 15(b)(2), Tito Contractors, Inc. hereby responds to the National Labor Relations Board's Application for Enforcement of its March 29, 2018 Order (366NLRB No. 47). Tito Contractors, Inc. has filed a Petition for Review (Appeal No. 18-1107), which has been consolidated with this case. Tito Contractors, Inc. admits that this Court has jurisdiction over this matter and that venue is appropriate. Tito Contractors, Inc. denies that the National labor Relations Board is entitled to the relief that it seeks and further states that the NLRB's decision is not supported by substantial record evidence, is arbitrary and capricious.

May 23, 2018



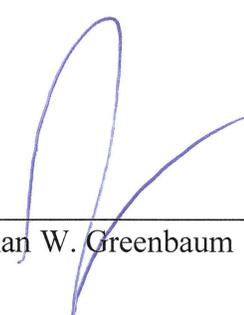
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CERTIFICATE OF SERVICE

I hereby certify that on May 23, 2018, copies of Response To Application For Enforcement were served on the following individuals via ecf:

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