



United States Government

NATIONAL LABOR RELATIONS BOARD

OFFICE OF THE GENERAL COUNSEL

Washington, D.C. 20570

June 28, 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. Ashford TRS Nickel, LLC, Ashford Hospitality Trust, Inc.
and all AHT affiliated enterprises, a single business enterprise and a
single employer*
Board Case No. 19-CA-032761

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, Ashford TRS Nickel, LLC, Ashford Hospitality Trust, Inc. and all AHT affiliated enterprises, a single business enterprise and a single employer, 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 Kira Dellinger Vol (202) 273-0656 and Joel Heller (202) 273-1042.

Very truly yours,

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. Ashford TRS Nickel, LLC, Ashford Hospitality Trust, Inc. and all AHT affiliated enterprises, a single business enterprise and a single employer
Board Case No. 19-CA-032761

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Regional Director

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

NATIONAL LABOR RELATIONS)
BOARD)

Petitioner)

v.)

Board Case No. 19-CA-032761

ASHFORD TRS NICKEL, LLC,)
ASHFORD HOSPITALITY TRUST,)
INC. and all AHT affiliated)
enterprises, a single business)
enterprise and a single employer)
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 Ashford TRS Nickel, LLC, Ashford Hospitality Trust, Inc. and all AHT affiliated enterprises, a single business enterprise and a single employer, on February 1, 2018, in Board Case No. 19-CA-032761, reported at 366 NLRB No. 6. 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 Anchorage, Alaska.

/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 28th day of June 2018

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

NATIONAL LABOR RELATIONS)
BOARD)

Petitioner)

v.)

Board Case No. 19-CA-032761

ASHFORD TRS NICKEL, LLC,)
ASHFORD HOSPITALITY TRUST,)
INC. and all AHT affiliated)
enterprises, a single business)
enterprise and a single employer)
Respondent)

CERTIFICATE OF SERVICE

I hereby certify that on June 28, 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 is being served today by email upon the following counsel:

Karl M. Terrell, Esquire
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kterrell@stokeswagner.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 28th day of June 2018