



United States Government

NATIONAL LABOR RELATIONS BOARD

OFFICE OF THE GENERAL COUNSEL

Washington, D.C. 20570

August 24, 2018

Patricia S. Dodszuweit, Esquire
Clerk, United States Court of Appeals
for the Third Circuit
21400 United States Courthouse
601 Market Street
Philadelphia, PA 19106-1790

Re: *NLRB v. Hard Hat Services, LLC*
Board Case No. 04-CA-196783

Dear Ms. Dodszuweit:

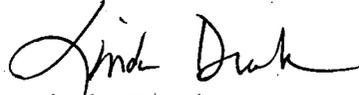
I am enclosing an original and five copies of the National Labor Relations Board's application for enforcement of its order in this case. Within 40 days of the Court's docketing of this application, I will file the certified list of the contents of the agency record.

Please serve a copy of this application on the Respondent, Hard Hat Services, 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 Usha Dheenani (202) 273-2948 and Rebecca Johnston (202) 273-1066.

Very truly yours,

A handwritten signature in black ink, appearing to read "Linda Dreeben". The signature is fluid and cursive, with the first name "Linda" being more prominent than the last name "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. Hard Hat Services, LLC
Board Case No. 04-CA-196783

Matthew A. Foley, Esquire
Walter H. Flamm, Jr., Esquire
Flamm Walton Heimbach
& Lamm, PC
794 Penllyn Pike, Suite 100
Blue Bell, PA 19422-1669
mafoley@flammlaw.com
whflamm@flammlaw.com

Respondent's Counsel

Sharon Modestein, Owner/Operator
Hard Hat Services, LLC
536 North Trooper Road
Norristown, PA 19403
sharon@hardhatservices.net

Respondent

James E. Goodley, Esquire
Jennings Sigmond PC
1835 Market Street, Suite 2710
Philadelphia, PA 19103-2929

Charging Party's Counsel

International Brotherhood of Electrical
Workers Local 98
1719 Spring Garden Street
Philadelphia, PA 19130

Charging Party

Dennis P. Walsh
NLRB Region 4
615 Chestnut Street, 7th Floor
Philadelphia, PA 19106-4404

Regional Director

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

NATIONAL LABOR RELATIONS BOARD)	
)	
Petitioner)	
)	
v.)	Board Case No.
)	04-CA-196783
HARD HAT SERVICES, 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 Hard Hat Services, LLC, on June 12, 2018, in Board Case No. 04-CA-196783, reported at 366 NLRB No. 106. 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 Norristown, Pennsylvania.



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 24th day of August 2018

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

NATIONAL LABOR RELATIONS BOARD)	
)	
Petitioner)	
)	
v.)	Board Case No.
)	04-CA-196783
HARD HAT SERVICES, LLC)	
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 via email upon the following counsel:

Matthew A. Foley, Esquire
Walter H. Flamm, Jr., Esquire
Flamm Walton Heimbach
& Lamm, P.C.
794 Penllyn Pike, Suite 100
Blue Bell, PA 19422-1669
mafoley@flammlaw.com
whflamm@flammlaw.com



Linda Dreeben
Deputy Associate General Counsel
NATIONAL LABOR RELATIONS BOARD
1015 Half Street, SE
Washington, DC 20570

Dated at Washington, DC
this 24th day of August 2018