

findings of fact or conclusions of law in the Board's Decision and Order, (b) the Board will seek to dismiss its enforcement action before this Court, and (c) the parties will enter compliance proceedings in which the amount of backpay due under the Board's Order may be directly litigated and adjudicated. This stipulation thus resolves the pending application for enforcement.

3. Therefore, the Board requests that this Court dismiss the Board's application for enforcement without prejudice to the Board's right to file a future application for enforcement in the event that the Company fails to meet its prospective obligations under the Order.

4. Each party is to bear its own costs.

5. Company counsel indicates that the Company does not oppose this motion.

WHEREFORE, the Board respectfully requests that the Court dismiss the Board's enforcement application without prejudice.

Respectfully submitted,

/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 24 day of September, 2018

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

NATIONAL LABOR RELATIONS BOARD)	
Petitioner)	
)	
v.)	No. 18-70981
)	
RAINBOW MEDICAL TRANSPORTATION, LLC)	
Respondent)	

CERTIFICATE OF COMPLIANCE

Pursuant to Federal Rule of Appellate Procedure 32(g)(1), the Board certifies that its motion contains 290 words of proportionally spaced, 14-point type, and that the word processing system used was Microsoft Word 2016.

/s/ Linda Dreeben
Linda Dreeben
Deputy Associate General Counsel
National Labor Relations Board
1015 Half Street, SE
Washington, DC 20570

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Respondent)	
)	

CERTIFICATE OF SERVICE

I hereby certify that on September 24, 2018, I electronically filed the foregoing unopposed motion 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 was served on all parties or their counsel of record through the appellate CM/ECF system.

/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 24 day of September, 2018