
Nos. 18-13845 & 18-14360

**IN THE UNITED STATES COURT OF APPEALS
FOR THE ELEVENTH CIRCUIT**

HYUNDAI MOTOR MANUFACTURING ALABAMA, LLC,

Petitioner & Cross-Respondent,

vs.

NATIONAL LABOR RELATIONS BOARD,

Respondent & Cross-Petitioner.

On Petition for Review and Cross-Application for Enforcement of an
Order of the National Labor Relations Board

**ANSWER TO NATIONAL LABOR RELATIONS BOARD'S
CROSS-APPLICATION FOR ENFORCEMENT**

Marcel L. Debruge
Michael L. Lucas
E. Travis Ramey
Meryl Cowan
BURR & FORMAN LLP
420 North 20th Street
Suite 3400 Wells Fargo Tower
Birmingham, Alabama 35203
(205) 251-3000

Counsel for Petitioner & Cross-Respondent

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NATIONAL LABOR RELATIONS BOARD,

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**PETITIONER & CROSS-RESPONDENT'S
CERTIFICATE OF INTERESTED PERSONS**

Counsel of record for Petitioner & Cross-Respondent Hyundai Motor Manufacturing Alabama, LLC certify that the following persons have an interest in the outcome of this appeal. Petitioner & Cross-Respondent makes these representations for the Judges of this Court to evaluate possible disqualification or recusal:

Amchan, Arthur, J., Administrative Law Judge

Burdick, Ruth E., Deputy Assistant General Counsel

Burr & Forman LLP, Counsel for Petitioner & Cross-Respondent

Cleckler, Justin, Former Employee of Petitioner & Cross-Respondent (named in charge)

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Cowan, Meryl, Counsel for Petitioner & Cross-Respondent

Debruge, Marcel L., Counsel for Petitioner & Cross-Respondent

Dheenan, Usha, Counsel for Respondent & Cross-Petitioner

Dormon, Rebecca A., Assistant to the Regional Director, Region 15

Dreeben, Linda, Counsel for Respondent & Cross-Petitioner

Emmanuel, William J., National Labor Relations Board Member

Howard, Nathan, Former Employee of Petitioner & Cross-Respondent (named in Charge)

Hyundai Motor America

Hyundai Motor Company, Ltd.

Hyundai Motor Manufacturing Alabama, LLC, Petitioner & Cross-Respondent

Johnston, Rebecca Jean, Counsel for Respondent & Cross-Petitioner

Kaplan, Marvin, National Labor Relations Board Member

Kyle, John W., Deputy General Counsel

Lucas, Michael L., Counsel for Petitioner & Cross-Respondent

McFerran, Lauren, National Labor Relations Board Member

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McKinney, M. Kathleen, Regional Director, Region 15

Miragliotta, Andrew T., Counsel for General Counsel

National Labor Relations Board, Respondent & Cross-Petitioner

Pearce, Mark Gaston, National Labor Relations Board Former
Member

Quinn, Connor, Weaver, Davies & Ruoco, LLP

Ramey, E. Travis, Counsel for Petitioner & Cross-Respondent

Ring, John F., National Labor Relations Board Chairman

Robb, Peter, General Counsel, National Labor Relations Board

Rouco, Richard P., Charging Party and Counsel for Intervenors

Smith, Christopher, General Counsel

Yarbrough, Nathan, Former Employer of Petitioner & Cross-
Respondent (named in Charge)

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Under Federal Rule of Appellate Procedure 26.1 and Eleventh Circuit Rule 26.1-1, Petitioner & Cross-Respondent certifies that it is a single member foreign limited liability company. Its single member is Hyundai Motor America, whose parent company is Hyundai Motor Company, Ltd., which is traded on the Korean Stock Exchange.

s/ Marcel L. Debruge

Marcel L. Debruge

One of the Attorneys for
Petitioner & Cross-Respondent
Hyundai Motor Manufacturing
Alabama, LLC

OF COUNSEL

BURR & FORMAN LLP
420 North 20th Street
Suite 3400 Wells Fargo Tower
Birmingham, Alabama 35203
(205) 251-3000
mdebruge@burr.com

**ANSWER TO NATIONAL LABOR RELATIONS BOARD'S
CROSS-APPLICATION FOR ENFORCEMENT**

Under Federal Rule of Appellate Procedure 15(b) and Eleventh Circuit Rule 15-3, Petitioner & Cross-Respondent Hyundai Motor Manufacturing Alabama, LLC, for its answer to the Cross-Application for Enforcement filed by the National Relations Board on October 17, 2018, respectfully states that the Court should not enforce the Board's order for the following reasons:

1. The Board's order is not supported by substantial evidence on the record as a whole, and it is contrary to applicable law.

2. The record affirmatively shows that the Petitioner & Cross-Respondent did not violate § 8(a)(1) of the National Labor Relations Act, as amended.

WHEREFORE, Petitioner & Cross-Respondent Hyundai Motor Manufacturing Alabama, LLC requests that the National Labor Relations Boards' Cross-Application for Enforcement be denied.

s/ Marcel L. Debruge
Marcel L. Debruge

One of the Attorneys for
Petitioner & Cross-Respondent
Hyundai Motor Manufacturing
Alabama, LLC

OF COUNSEL

Marcel L. Debruge

Michael L. Lucas

E. Travis Ramey

Meryl Cowan

BURR & FORMAN LLP

420 North 20th Street

Suite 3400 Wells Fargo Tower

Birmingham, Alabama 35203

Telephone: (205) 251-3000

Facsimile: (205) 458-5100

mdebruge@burr.com

mlucas@burr.com

tramey@burr.com

mcowan@burr.com

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CERTIFICATE OF SERVICE

I hereby certify that on November 7, 2018, a copy of the foregoing has been electronically filed with the Clerk of the Court using the CM/ECF system, which will serve it on the following CM/ECF participants. If a party served does not participate in the CM/ECF system, I have served them by U.S. First Class Mail.

Peter Robb
National Labor Relations Board
General Counsel
1099 14th Street Northwest
Washington D.C. 20570

Linda Dreeben
Usha Dheenan
Rebecca Jean Johnston
National Labor Relations Board
Appellate Litigation
1015 Half Street Southeast
Washington, D.C. 20570

M. Kathleen McKinney
National Labor Relations Board Regional Office
600 South Maestri Place, FL 7
New Orleans, Louisiana 70130-3413

Andrew T. Miragliotta
National Labor Relations Board
General Counsel
233 Peachtree Street Northeast, Suite 1000
Atlanta, Georgia 30303

Richard Paul Rouco
QUINN CONNOR WEAVER DAVIES & ROUCO, LLP
2 20th Street North, Suite 930
Birmingham, Alabama 35203

s/ Marcel L. Debruge
OF COUNSEL