

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

<b>National Labor Relations Board</b>	:	
	:	
<b>Petitioner</b>	:	<b>Case No. 20-1210</b>
	:	
<b>v.</b>	:	
	:	
<b>Boothwyn Fire Company No. 1</b>	:	
	:	
<b>Respondent</b>	:	

**BOOTHWYN FIRE COMPANY NO. 1'S ANSWER TO  
THE NATIONAL LABOR RELATIONS BOARD'S  
APPLICATION FOR ENFORCEMENT**

Pursuant to Fed. R. App. P. 15(b)(2), Boothwyn Fire Company No. 1 (“Respondent”) files this Answer to the National Labor Relations Board’s Application for Enforcement of its order dated May 16, 2016:

Respondent admits that this Court has jurisdiction over the Board’s application under Section 10(e) of the National Labor Relations Act, 29 U.S.C. § 160(e), and that venue is proper in this Circuit because the alleged unfair labor practices occurred in Boothwyn, Pennsylvania.

Denied that the Board is entitled to an enforcement order. Respondent hereby incorporates by reference all exceptions, claims and defenses asserted by Respondent in the Administrative Proceedings underlying the Board’s Order of May 16, 2016 and in the proceedings before the United States Court of Appeals for the Third Circuit *National Labor Relations Board v. Boothwyn Fire Company No 1*, Nos. 16-2607 and 16-2791.

WHEREFORE, Boothwyn Fire Company No. 1 requests this court to deny the National Labor Relations Board's Application for Enforcement.

**RAWLE & HENDERSON LLP**



By: \_\_\_\_\_

Fred B. Buck, Esquire  
Identification No. 31642  
Attorneys for Respondent,  
Boothwyn Fire Company No. 1  
The Widener Building  
One South Penn Square  
Philadelphia, PA 19107  
(215) 575-4200

Dated: February 18, 2020

**CERTIFICATE OF SERVICE**

I hereby certify that the foregoing Answer to the National Labor Relations Board's Application for Enforcement was filed with the Clerk of the Court for the United States Court of Appeals for the Third Circuit by using the Appellate CM/ECF system. The answer was served on all counsel of record through the CM/ECF system as all counsel are registered users and service will be accomplished thorough the CM/ECF system.

**RAWLE & HENDERSON LLP**



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Identification No. 31642  
Attorneys for Respondent,  
Boothwyn Fire Company No. 1  
The Widener Building  
One South Penn Square  
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