

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

NATIONAL LABOR RELATIONS	)	
BOARD	)	
	)	No. 20-1949
Petitioner	)	
	)	
v.	)	Board Case No.
	)	06-CA-063690
MCPc, INC.	)	
	)	
Respondent	)	

**RESPONDENT’S ANSWER TO APPLICATION FOR ENFORCEMENT  
OF AN ORDER OF THE NATIONAL LABOR RELATIONS BOARD**

Pursuant to Rule 15(b)(2) of the Federal Rules of Appellate Procedure, Respondent MCPc, Inc., by its undersigned attorneys, hereby files its Answer to Application for Enforcement of an Order of the National Labor Relations Board (the “Board”) dated May 23, 2019, in Board Case No. 06–CA–063690, reported at 367 NLRB No. 137 (the “Order”), averring as follows:

1. MCPc, Inc. admits this Court has jurisdiction over this case pursuant to Section 10 of the National Labor Relations Act, as amended, 29 U.S.C. §§ 160 (the “Act”).
2. MCPc, Inc. admits that venue is proper in this Court.

3. MCPc, Inc. admits that the Board's final order in this matter was issued against MCPc, Inc., on May 23, 2019, in Board Case No. 06-CA-063690, reported at 367 NLRB No. 137.
4. MCPc, Inc. hereby incorporates by reference all exceptions, claims, and defenses heretofore asserted by MCPc, Inc. in the administrative proceedings underlying the Board's Order, and in all prior appellate proceedings before this Court.
5. MCPc, Inc. denies that the Board is entitled to enforce its Order and respectfully requests that the Order be vacated in its entirety.

WHEREFORE, Respondent MCPc, Inc. respectfully requests that the Court decline to enforce the Order and vacate the Order in its entirety.

DATED this 11th day of June, 2020

Respectfully submitted,

/s/ Scott V. Kamins

Scott Kamins

Offit Kurman, P.A.

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**CERTIFICATE OF COMPLIANCE**

Pursuant to Federal Rule of Appellate Procedure 32(g)(1), the Board certifies that this document contains 296 words of proportionally-spaced, 14-point type, and the word processing system used was Microsoft Word 365.

DATED this 11th day of June, 2020

Respectfully submitted,

/s/ Scott V. Kamins  
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**CERTIFICATE OF SERVICE**

I certify that on June 11, 2020, I electronically filed the foregoing with the Clerk of the Court for the U.S. Court of Appeals for the Third Circuit by using the appellate CM/ECF system. I further certify that this document was served on all parties or their counsel of record through the appellate CM/ECF system.

DATED this 11th day of June, 2020

Respectfully submitted,

/s/ Scott V. Kamins  
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