

No. 20-1589

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

NATIONAL LABOR RELATIONS BOARD

Petitioner

v.

**MAINE COAST REGIONAL HEALTH FACILITIES, d/b/a Maine Coast
Memorial Hospital, the sole member of which is Eastern Maine Healthcare
Systems**

Respondent

ANSWER TO PETITION FOR ENFORCEMENT

Respondent Maine Coast Regional Health Facilities, d/b/a Maine Coast Memorial Hospital, the sole member of which is Eastern Maine Healthcare Systems (the “Respondent”), in answer to the Application for Enforcement of an Order of the National Labor Relations Board (the “Petition”) filed by the National Labor Relations Board (the “NLRB”) seeking enforcement of the NLRB’s Decision and Order, dated March 30, 2020, in Board Case Nos. 01-CA-209105 and 01-CA-212276 (the “Decision and Order”), responds as follows:

1. Admits that this Court has jurisdiction over this matter and that venue is properly placed.

2. Admits that the NLRB filed with its Petition a true and complete copy of the Decision and Order.

3. Denies that the Respondent violated the National Labor Relations Act (“NLRA”).

4. Denies that the factual findings contained in the Decision and Order as to Respondent (including the factual findings of Administrative Law Judge Paul Bogas incorporated into and/or affirmed by the Decision and Order) are supported by substantial evidence, and denies that the NLRB’s legal conclusions that Respondent violated the NLRA are correct.

5. Denies that Petitioner is entitled to enforcement of the Decision and Order in whole or in part.

6. Denies that Petitioner and/or the Charging Party, Karen-Jo Young, are entitled to the relief specified and sought in the Decision and Order in whole or in part.

WHEREFORE, the Respondent respectfully requests that the Court deny enforcement of the Decision and Order and grant the Respondent such other further relief as this Court may deem just and proper.

Dated: June 22, 2020

Respectfully submitted,

/s/ Joshua A. Randlett

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Attorneys for the Respondent

CERTIFICATE OF SERVICE

I hereby certify that on June 22, 2020, I electronically filed the foregoing **Answer to Petition for Enforcement** with the United States Court of Appeals for the First Circuit by using the CM/ECF system. I certify that the following parties or their counsel of record are registered as ECF Filers and they will be served by the EM/ECF system: David Habenstreit, Kira Dellinger Vol, and Eric Weitz, each of whom is counsel for Petitioner NLRB.

/s/ Joshua Randlett

Joshua Randlett, Esq.
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Counsel for the Respondent

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