

CASE NO. 20-2199

IN THE UNITED STATES COURT OF APPEALS
FOR THE THIRD CIRCUIT

INTERNATIONAL ALLIANCE OF THEATRICAL
STAGE EMPLOYEES, MOVING PICTURE TECHNICIANS,
ARTISTS AND ALLIED CRAFTS OF THE UNITED STATES,
ITS TERRITORIES AND CANADA (IATSE) LOCAL 8

Petitioner

v.

THE NATIONAL LABOR RELATIONS BOARD

Respondent

ON APPEAL FROM
NATIONAL LABOR RELATIONS BOARD, Case 369 NLRB 67
Cases 04-CB-216541 and 04-CB-221871 entered on April 29, 2020

ANSWER TO CROSS APPLICATION FOR ENFORCEMENT

Regina C. Hertzog, Esquire
CLEARY, JOSEM & TRIGIANI LLP
325 Chestnut Street, Suite 200
Philadelphia, PA 19106
Telephone: 215-735-9099
Fax: 215-640-3201

Attorneys for Petitioner

Respondent admits that this Court has jurisdiction but denies the that the Petition for Enforcement should be granted. The Court should deny the Petition of Enforcement and set aside the Decision and Order of the National Labor Relations Board in full.

Respectfully submitted,
CLEARY, JOSEM & TRIGIANI, P.C.

Date: June 25, 2020

BY: /s/ Regina C. Hertzig
REGINA C. HERTZIG, ESQUIRE
325 Chestnut Street, Suite 200
Philadelphia, PA 19106
(215) 735-9099
rhertzig@cjtlaw.org
Attorneys for Petitioner

CERTIFICATE OF SERVICE

I hereby certify that I caused a true and correct copy of the foregoing Answer to Cross Application for Enforcement to be served upon the following via email and via the Third Circuit Court of Appeals ECF on the date indicated below:

Roxanne L. Rothschild, Executive Secretary
David Seid, Esquire
Julie B. Broido, Esquire
David Habenstreit, Esquire
General Counsel NLRB
1015 Half St. SE
Washington, D.C. 20570
roxanne.rothschild@nlrb.gov

David Rodriguez, Esquire
National Labor Relations Board, Region 4
100 Penn Square East, Suite 403
Philadelphia, PA 19107
david.rodriguez@nlrb.gov

Martin McIntyre
73 Daretown Alloway Road
Elmer, NJ 08318
mchrismac34@aol.com

/s/ Regina C. Hertzig
REGINA C. HERTZIG, ESQUIRE

DATED: June 25, 2020