

United States Court of Appeals
for the
THIRD CIRCUIT

EAST BRUNSWICK EUROPEAN WAX)	
CENTER, LLC,)	
)	No. 20-2120
Petitioner,)	
)	Board Case No.:
v.)	22-CA-178646
)	
NATIONAL LABOR RELATIONS BOARD)	
& KELLI E MEAGAN ZAMBRANO,)	
)	
Respondent.)	

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

In accordance with Federal Rule of Appellate Procedure 15(b)(2), Petitioner, East Brunswick European Wax Center, LLC (“EBEWC”) hereby answers the Cross-Application for Enforcement of an Order of the National Labor Relations Board (“NLRB” or “the Board”), filed with the Court on June 16, 2020, as follows:

1. EBEWC admits that the Board issued an Order against EBEWC on May 13, 2020 in Case No. 22-CA-178646, reported at 369 NLRB No. 77 (2020).
2. EBEWC admits that on June 3, 2020, EBEWC filed a petition with this Court to review the Board’s May 13, 2020 Order.
3. EBEWC denies that the Board is entitled to enforcement of its Order.
4. EBEWC admits that the Court has jurisdiction over the Board’s Cross-Application under Section 10(e) and (f) under the National Labor Relations Act, as amended (29 U.S.C. § 160(e) - (f)) but denies that any unfair labor practices occurred and further denies that the Board is entitled to the relief sought in its Cross-Application.

EBEWC requests that the Court grant EBEWC’s Petition for Review, deny the Board’s

Cross-Application for Enforcement, and grant EBEWC any further relief to which EBEWC may be entitled.

Date: July 7, 2020

LAW OFFICE OF GERARD C. VINCE, LLC

/s/ *Carmen M. Finegan*

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CERTIFICATION OF SERVICE

I, Carmen M. Finegan, of full age hereby certify that on July 7, 2020, that I electronically filed the foregoing with the Clerk of Court for the United States 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.

Date: July 7, 2020

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