

UNITED STATES COURT OF APPEALS
FOR THE FOURTH CIRCUIT

NATIONAL LABOR RELATIONS BOARD	:	
	:	
Applicant	:	Docket No: 20-1694
	:	
v.	:	
	:	
GREENBRIER, VMC, LLC D/B/A	:	
GREENBRIER VALLEY MEDICAL CENTER	:	
	:	
Respondent	:	
	:	

**ANSWER TO APPLICATION FOR ENFORCEMENT OF AN
ORDER OF THE NATIONAL LABOR RELATIONS BOARD UPON
STIPULATION OF THE PARTIES FOR CONSENT JUDGMENT**

Greenbrier, VMC, LLC d/b/a Greenbrier Valley Medical Center
(hereafter, “Greenbrier”), as the Respondent in the above-captioned case,
hereby answers, by and through Greenbrier’s Counsel and pursuant to Fed.
R. App. P. 15(b), the Application for Enforcement (hereafter, the
“Application”) filed by the National Labor Relations Board (hereafter, the
“Board”) on June 25, 2020, with respect to the Decision and Order
(hereafter, the “Decision”) issued by the Board on June 17, 2020, and
reported at Greenbrier, VMC, LLC d/b/a Greenbrier Valley Medical Center,
et. al., www.nlr.gov/case/10-CA-150997, as follows:

A. Jurisdiction of this Court

Greenbrier admits that the Court has jurisdiction over the Application.

Greenbrier admits that venue is proper before the Court.

B. The Respondent Entered into a Stipulation Providing for Entry of an Order by the Board and a Consent Judgment by the Court

(1) Greenbrier admits the averments regarding the Board's Order set forth in Paragraph B (1) of the Application.

(2) Greenbrier admits the averments regarding the stipulation set forth in Paragraph B (2) of the Application.

(3) Greenbrier acknowledges the Board's certification and filing set forth in Paragraph B (3) of the Application.

Dated: Glastonbury, CT
July 17, 2020

Respectfully submitted,

BRYAN T. CARMODY, ESQ.

/s/ _____

Bryan T. Carmody, Esq.
Attorney for Respondent
134 Evergreen Lane
Glastonbury, Connecticut 06033
(203) 249-9287
(860) 430-9437 (fax)
bcarmody@carmodyandcarmody.com

UNITED STATES COURT OF APPEALS
FOR THE FOURTH CIRCUIT

NATIONAL LABOR RELATIONS BOARD	:	
	:	
Applicant	:	Docket No: 20-1694
	:	
v.	:	
	:	
GREENBRIER, VMC, LLC D/B/A	:	
GREENBRIER VALLEY MEDICAL CENTER	:	
	:	
Respondent	:	
	:	

**CERTIFICATE OF SERVICE OF ANSWER TO APPLICATION
FOR ENFORCEMENT OF AN ORDER OF THE NATIONAL
LABOR RELATIONS BOARD UPON STIPULATION OF THE
PARTIES FOR CONSENT JUDGMENT**

I hereby certify, as an attorney admitted to the practice of law and pursuant to 28 U.S.C. § 1746, that I electronically filed an “Answer to Application for Enforcement of an Order of the National Labor Relations Board Upon Stipulation of the Parties for Consent Judgment” on behalf of Greenbrier, VMC, LLC d/b/a/ Greenbrier Valley Medical Center with the Clerk of the Court of the United States Court of Appeals for the Fourth Circuit on July 17, 2020, by using the appellate CM / ECF system.

I further certify that he foregoing document was served on all those parties or their counsel of record through the CM / ECF system if they are

registered users or, if they are not, by serving a true and correct copy at the addresses listed below:

David Habenstreit, Deputy Assistant General Counsel
National Labor Relations Board
1099 14th Street, NW
Washington, DC 20570
(202) 273-2960
appellatecourt@nlrb.gov

Dated: Glastonbury, CT
July 17, 2020

Respectfully submitted,

BRYAN T. CARMODY, ESQ.

/s/ _____

Bryan T. Carmody, Esq.
Attorney for Respondent
134 Evergreen Lane
Glastonbury, Connecticut 06033
(203) 249-9287
(860) 430-9437 (fax)
bcarmody@carmodyandcarmody.com