

**UNITED STATES OF AMERICA  
BEFORE THE NATIONAL LABOR RELATIONS BOARD**

HORSESHOE  
ENTERTAINMENT, L.P. d/b/a  
HORSESHOE BOSSIER CITY  
HOTEL AND CASINO

Petitioner

v.

NATIONAL LABOR  
RELATIONS BOARD

Respondent

No. 20-60647

Board Case No. 15-CA-215656 *et al*

**PETITIONER-CROSS-RESPONDENT'S  
MOTION FOR LEAVE TO FILE RESPONSE TO  
NLRB'S CROSS-APPLICATION FOR ENFORCEMENT**

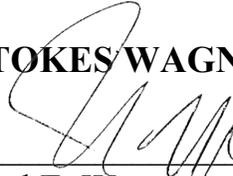
Petitioner-Cross-Respondent Horseshoe Entertainment, LP, d/b/a Horseshoe Bossier City Hotel & Casino (hereinafter "Horseshoe"), makes the following motion for leave to file the attached Response to the Board's Cross-Application for Enforcement of its order:

1. This action was initiated by the Petitioner, Horseshoe, which on July 21, 2020, filed a Petition for Review of an Order of the National Labor Relations Board.
2. The Board filed a Cross-Application for Enforcement of its Order on August 6, 2020.

3. Pursuant to Federal Rule of Appellate Procedure 15(b), Horseshoe is required to file a response to the Board's Cross-Application: "Within 21 days after the application for enforcement is filed, the respondent must serve on the applicant an answer to the application and file it with the clerk. If the respondent fails to answer in time, the court will enter judgment for the relief requested."
4. Undersigned counsel has conferred with counsel for the NLRB, which has confirmed that the Board has no objection to the filing of the attached Response to the Board's Cross-Application.

Dated this 27th day of August 2020.

**STOKES WAGNER, ALC**



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*Attorneys for Defendant*

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

HORSESHOE ENTERTAINMENT,  
L.P. d/b/a HORSESHOE BOSSIER  
CITY HOTEL AND CASINO

Petitioner

v.

NATIONAL LABOR RELATIONS  
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**CERTIFICATE OF SERVICE**

I hereby certify that the foregoing Motion for Leave to File Response to the Board's Cross-Application for Enforcement of an Order of the National Labor Relations Board was served by U.S. First Class Mail on August 27, 2020, to the following:

Peter B. Robb  
General Counsel  
National Labor Relations Board  
1015 Half Street SE  
Washington, DC 20570

Kathleen McKinney, Regional Director  
Region 15  
National Labor Relations Board  
600 South Maestri Place  
7th Floor  
New Orleans, LA 70130-3413

*/s/ Paul Wagner*

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Paul E. Wagner