
No. 20-13027

**IN THE UNITED STATES COURT OF APPEALS
FOR THE ELEVENTH CIRCUIT**

NATIONAL LABOR RELATIONS BOARD,

Petitioner,

vs.

E. A. RENFROE & COMPANY, INC.

Respondent.

**RESPONDENT'S ANSWER TO NATIONAL LABOR RELATIONS
BOARD'S APPLICATION FOR ENFORCEMENT**

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Counsel for Respondent

CERTIFICATE OF INTERESTED PERSONS

Counsel of record for E. A. Renfroe & Company, Inc. certifies that the following persons have an interest in the outcome of this appeal.

Kamani Adams – Charging Party

Burr & Forman LLP – Counsel for Appellee

David Habenstreit – Counsel for Petitioner

E. A. Renfroe & Company, Inc. - Respondent

Marvin E. Kapla - Member, National Labors Relation Board

Elizabeth Heaney – Counsel for Petitioner

Joel Heller – Counsel for Petitioner

Keltner W. Locke - Administrative Law Judge

Lauren McFerran - Member, National Labors Relation Board

Bryance Metheny – Counsel for Respondent

Ashley Hattaway–General Counsel, E.A. Renfroe & Company, Inc.

National Labor Relations Board – Petitioner

Matthew Scully– Counsel for Respondent

John F. Ring – Chairman - National Labors Relation Board

Travis Ramey – Counsel for Respondent

**ANSWER TO NATIONAL LABOR RELATIONS BOARD'S
APPLICATION FOR ENFORCEMENT**

Under Federal Rule of Appellate Procedure 15(b) and Eleventh Circuit Rule 15-3, Respondent E.A. Renfroe & Company, Inc. answers the Application for Enforcement filed by the National Relations Board on August 14, 2020, and respectfully states that the Court should not enforce the Board's order for the following reasons:

1. The Board's order is not supported by substantial evidence on the record as a whole and it is contrary to applicable law.

2. The record affirmatively shows that the Petitioners & Cross-Respondent did not violate the National Labor Relations Act, as amended.

WHEREFORE, Respondent E.A. Renfroe & Company, Inc., requests that the National Labor Relations Board's Application for Enforcement be denied.

/s/ K. Bryce Metheny

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CERTIFICATE OF COMPLIANCE WITH RULE 32

This answer complies with the type-face requirements of Federal Rule of Appellate Procedure 32(a)(5) and the type-style requirements of Federal Rule of Appellate Procedure 32(a)(6). This answer has been prepared in 14-point Century Schoolbook, which is a proportionally spaced font that includes serifs.

This answer complies with the type-volume limitations in Federal Rule of Appellate Procedure 27(d)(2)(A) because it contains 120 words, excluding the cover, certificate of interested persons, corporate disclosure statement, signature block, Rule 32 certificate, and certificate of service.

/s/ K. Bryance Metheny

K. Bryance Metheny

CERTIFICATE OF SERVICE

I hereby certify that on September 2, 2020, I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF System, which will send a notice of electronic filing to the following:

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*/s/ K. Bryance Metheny*_____