

the Region overstepped its authority by interpreting the FLSA or that the Board lacks jurisdiction over this matter are supported by Board law. The same is true of its claims that because it owes no back pay, and because it maintained no records of crucial information required to compute its backpay liability, it is not bound by the requirements of Section 102.56(b). Finally, Respondent's complaints about the Region's methodology and conclusions are unsubstantiated and do not support denial of the Motion.

In conclusion, Respondent's general denials as to the disputed paragraphs of the Specification are insufficient under Section 102.56(b) of the Rules and, therefore, should be stricken and deemed admitted. Once they are deemed admitted, no genuine issues remain for hearing, and the Board should grant Counsel for the General Counsel's Motion and the relief sought therein.

Boston, Massachusetts Date:

September 22, 2020

Respectfully submitted,

*Emily Goldman*

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