

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

DUPONT SPECIALTY PRODUCTS USA, LLC,
as a successor to E. I. DU PONT DE NEMOURS
AND COMPANY

Petitioner,

v.

NATIONAL LABOR RELATIONS BOARD,

Respondent.

Nos. 20-3480
20-3179

**DUPONT SPECIALTY PRODUCTS USA, LLC’S ANSWER
TO THE NATIONAL LABOR RELATIONS BOARD’S
APPLICATION FOR ENFORCEMENT OF AN ORDER OF
THE NATIONAL LABOR RELATIONS BOARD**

On October 23, 2020, DuPont Specialty Products USA, LLC (“DuPont”), petitioned the United States Court of Appeals for the Third Circuit for review of the Decision and Order of the National Labor Relations Board (“NLRB”) reported at 369 NLRB No. 117 (July 8, 2020), as amended on August 12, 2020 (the “Decision”). Petitioner’s appeal was docketed with the Third Circuit as case no. 20-3179.

On December 9, 2020, the NLRB filed a Cross-Application for Enforcement in a case docketed with the Third Circuit as case no. 20-3480. DuPont hereby answers the National Labor Relations Board’s (“NLRB”) Cross-Application for Enforcement as follows:

DuPont denies that the NLRB is entitled to the relief it seeks through its Cross-Application for Enforcement based upon the grounds to be asserted by DuPont in case no. 20-3179, and respectfully requests that the Court deny the Cross-Application for Enforcement in case 20-3480.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on December 28, 2020, copies of the foregoing were served electronically on counsel for the parties of record through the CM/ECF notification system.

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