



United States Government

NATIONAL LABOR RELATIONS BOARD

OFFICE OF THE GENERAL COUNSEL

Washington, D.C. 20570

March 17, 2021

Molly Dwyer
Clerk of the Court
United States Court of Appeals
for the Ninth Circuit
Post Office Box 193939
San Francisco, CA 94119-3939

Re: *Kava Holdings, LLC, d/b/a Hotel Bel-Air v. NLRB*
9th Cir. No. 21-70225, Board No. 31-CA-074675

Dear Ms. Dwyer:

Attached is the National Labor Relations Board's cross-application for enforcement of its Order in this case.

Please serve a copy of the cross-application on the Petitioner, Kava Holdings, LLC, d/b/a Hotel Bel-Air, whose address appears on the service list. I have served a copy of the cross-application on each party admitted to participate in the Board proceedings, and their names and addresses also appear on the service list.

I am counsel of record for the Board, and all correspondence should be addressed to me. The Board attorneys directly responsible for this case are Usha Dheenani (202) 273-2948, and Michael Hickson (202) 273-2985.

Sincerely,

/s/ Ruth E. Burdick

Ruth E. Burdick

Acting Deputy Associate General Counsel

NATIONAL LABOR RELATIONS BOARD

1015 Half Street, SE

Washington, DC 20570

(202) 273-2960

Enclosure

SERVICE LIST

Kava Holdings, LLC, d/b/a Hotel Bel-Air v. NLRB
Ninth Cir. No. 21-70225, Board No. 31-CA-074675

Arch Y. Stokes, Esq.
Karl M. Terrell, Esq.
Diana Lerma, Esq.
Stokes Wagner
One Atlantic Center
1201 W Peachtree Street, Suite 2615
Atlanta, GA 30309-3449
Email: astokes@stokeswagner.com
Email: kterrell@stokeswagner.com
Email: dlerma@stokeswagner.com
(Served via CM/ECF and email.)

Petitioner's Counsel

Hotel Bel-Air
701 Stone Canyon Road
Los Angeles, CA 90077-2909
(Served via counsel by CM/ECF.)

Petitioner

Kirill Penteshin, Esq.
Schwartz, Steinsapir, Dohrmann
& Sommers, LLP
6300 Wilshire Blvd. Suite 2000
Los Angeles, CA 90048-5268
kp@ssdslaw.com
(Served via email with consent.)

Charging Party's Counsel

Jeremy Blasi, General Counsel
UNITE HERE Local 11
464 Lucas Avenue, Suite 201
Los Angeles, CA 90017-2074
Email: jblasi@unitehere11.org
(Served via email with consent.)

Charging Party

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

KAVA HOLDINGS, LLC, D/B/A HOTEL BEL-AIR)	
Petitioner)	No. 21-70225
)	
v.)	Board Case No.
)	31-CA-074675
NATIONAL LABOR RELATIONS BOARD)	
Respondent)	

**CROSS-APPLICATION FOR ENFORCEMENT
OF AN ORDER OF THE
NATIONAL LABOR RELATIONS BOARD**

The National Labor Relations Board hereby cross-applies to the Court for enforcement of its Order issued against Kava Holdings, LLC, d/b/a Hotel Bel-Air on January 25, 2021, in Board Case No. 31-CA-074675, reported at 370 NLRB No. 73. On February 03, 2021, the Petitioner, Kava Holdings, LLC, d/b/a Hotel Bel-Air, filed a petition with this Court to review the same Board Order. The Board seeks enforcement of its Order in full.

The Court has jurisdiction over this cross-application pursuant to Section 10(e) and (f) of the National Labor Relations Act, as amended (29 U.S.C. § 160(e) and (f)), because the Petitioner is aggrieved by the Board's Order. Venue is proper in this Circuit because the unfair labor practices occurred in Los Angeles, California.

/s/ Ruth E. Burdick
Ruth E. Burdick
Acting Deputy Associate General Counsel
NATIONAL LABOR RELATIONS BOARD
1015 Half Street, SE
Washington, DC 20570
(202) 273-2960

Dated at Washington, DC
this 17th day of March 2021

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

KAVA HOLDINGS, LLC, D/B/A HOTEL BEL-AIR)	
Petitioner)	No. 21-70225
)	
v.)	Board Case No.
)	31-CA-074675
NATIONAL LABOR RELATIONS BOARD)	
Respondent)	

CERTIFICATE OF SERVICE

I hereby certify that on March 17, 2021, I filed the foregoing document with the Clerk of the Court for the United States Court of Appeals for the Ninth Circuit by using the CM/ECF system. I certify that the foregoing document is also being served today via e-mail upon the following counsel:

Arch Y. Stokes, Esq.
Karl M. Terrell, Esq.
Diana Lerma, Esq.
Stokes Wagner
One Atlantic Center
1201 W Peachtree Street, Suite 2400
Atlanta, GA 30309-3449
Email: astokes@stokeswagner.com
Email: kterrell@stokeswagner.com
Email: lerma@stokeswagner.com

/s/ Ruth E. Burdick
Ruth E. Burdick
Acting Deputy Associate General Counsel
NATIONAL LABOR RELATIONS BOARD
1015 Half Street, SE
Washington, DC 20570
(202) 273-2960

Dated at Washington, DC
this 17th day of March 2021