



United States Government

NATIONAL LABOR RELATIONS BOARD

OFFICE OF THE GENERAL COUNSEL

Washington, DC 20570-0001

December 9, 2020

Patricia S. Dodszuweit, Esquire
Clerk, United States Court of Appeals
for the Third Circuit
21400 United States Courthouse
601 Market Street
Philadelphia, PA 19106-1790

Re: *FDRLST Media, LLC, v. NLRB*
3rd Cir. No. 20-3434, Board Case No. 02-CA-243109

Dear Ms. Dodszuweit:

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, FDRLST Media, LLC, 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 Kira Vol (202) 273-0656 and Micah Jost (202) 273-0264.

/s/ David Habenstreit

David Habenstreit
Assistant General Counsel
NATIONAL LABOR RELATIONS BOARD
1015 Half Street, SE
Washington, DC 20570-0001
(202) 273-2960

Enclosures

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

FDRLST MEDIA, LLC)	
)	
)	
Petitioner)	No. 20-3434
)	
v.)	Board Case No.
)	02-CA-243109
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 FDRLST Media, LLC, on November 24, 2020, in Board Case No. 02-CA-243109 reported at 370 NLRB No. 49. On December 1, 2020, the Petitioner, FDRLST Media, LLC 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 Petitioner is incorporated in Delaware.

/s/ David Habenstreit
David Habenstreit
Assistant General Counsel
NATIONAL LABOR RELATIONS BOARD
1015 Half Street, SE
Washington, DC 20570-0001
(202) 273-2960

Dated at Washington, DC
this 9th day of December 2020

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

FDRLST MEDIA, LLC)	
)	
Petitioner)	No. 20-3434
)	
v.)	Board Case No.
)	02-CA-243109
NATIONAL LABOR RELATIONS BOARD)	
)	
Respondent)	

CERTIFICATE OF SERVICE

I hereby certify that on December 9, 2020, I filed the foregoing document with the Clerk of the Court for the United States Court of Appeals for the Third Circuit by using the CM/ECF system. I certify that the foregoing document is being served today via email upon the following counsel:

Jared McClain Esq.
Adiyta Dynar Esq.
Kara Rollins Esq.
New Civil Liberties Alliance
1225 19th Street, NW Suite 450
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Email: jared.mcclain@ncla.legal
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/s/ David Habenstreit
David Habenstreit
Assistant General Counsel
NATIONAL LABOR RELATIONS BOARD
1015 Half Street, SE
Washington, DC 20570-0001
(202) 273-2960

Dated at Washington, DC
this 9th day of December 2020