

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF RHODE ISLAND**

**AMERICAN FEDERATION OF  
GOVERNMENT EMPLOYEES  
NATIONAL VA COUNCIL**

**AMERICAN FEDERATION OF  
GOVERNMENT EMPLOYEES  
LOCAL 2305**

*Plaintiffs,*

**v.**

**UNITED STATES DEPARTMENT  
OF VETERANS AFFAIRS; and**

**DOUGLAS A. COLLINS, in his official  
capacity as U.S. Secretary of Veterans  
Affairs**

*Defendants.*

**Case No. 1:25-cv-00583-MRD-PAS**

**PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION AND  
RELIEF UNDER 5 U.S.C. § 705**

**TO THE COURT AND ALL PARTIES:**

Pursuant to Federal Rule of Civil Procedure 65 and 5 U.S.C. § 705, Plaintiffs move the Court for a preliminary injunction and/or an order to stay or preliminary set aside Defendants' August 6, 2025 termination of the 2023 Master Collective Bargaining Agreement and any amendments, local supplemental agreements, and memoranda of understanding between Defendants and Plaintiff NVAC, Plaintiff AFGE Local 2305, and/or other NVAC-affiliated local union ("the Termination"), on the grounds that the Termination violated Plaintiffs' First Amendment rights and the Administrative Procedure Act. Plaintiffs further move the Court for an order enjoining Defendants from taking any action to effectuate the Termination. In support of this motion, Plaintiffs concurrently file a supporting memorandum, the sworn declarations of Mary-Jean Burke, William Wetmore, Frederick Sacchi, Ira Kedson, Sonia Chaves, Dewanda Mitchell, and Travis Silva, the exhibits thereto, the argument of the parties and such other evidence and argument as the Court may deem proper.

Pursuant to LR Cv 7(c), Plaintiffs request oral argument on this motion and anticipate that it will require approximately an hour of argument time.

Respectfully submitted,

LAW OFFICE OF CARLY B. IAFRATE, PC

Dated: November 25, 2025

By: /s/ Carly Beauvais Iafrate

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Dated: November 25, 2025

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Council and American Federation of  
Government Employees Local 2305*

### **CERTIFICATE OF SERVICE**

I hereby certify that on November 25, 2025, I electronically filed the within motion and it is available for viewing and downloading from the Court's CM/ECF System, and that the participants in the case that are registered CM/ECF users will be served electronically by the CM/ECF system.

I further certify that I will serve by certified mail a copy of this motion and all supporting papers on the individuals listed below (see Fed. R. Civ. P. 4(i)), and that such mailing is intended to be completed on November 26, 2025.

1. U.S. Department of Veterans Affairs, Office of the General Counsel (022D), 810 Vermont Avenue N.W. Washington, D.C. 20420.

2. Douglas Collins, in his official capacity as Secretary of the Department of Veterans Affairs, U.S. Department of Veterans Affairs Office of the General Counsel (022D), 810 Vermont Avenue N.W. Washington, D.C. 20420.

3. Civil Process Clerk, Office of the United States Attorney, District of Rhode Island, One Financial Plaza, 17th Floor Providence, RI 02903.

/s/ Jessica Landers