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**UNITED STATES DISTRICT COURT**  
**EASTERN DISTRICT OF CALIFORNIA**  
**FRESNO DIVISION**

UNITED FARM WORKERS, *et al.*,

Plaintiffs,

v.

UNITED STATES DEPARTMENT OF LABOR;

LORI CHAVEZ-DEREMER, in her official  
capacity as Secretary of Labor;

LORI FRAZIER BEARDEN, in her official  
capacity as Acting Assistant Secretary for  
Employment and Training

Defendants.

Civil Case No.: 1:25-cv-1614

**NOTICE OF MOTION FOR PLAINTIFFS'  
MOTION FOR A SECTION 705 STAY  
AND PRELIMINARY INJUNCTION**

**ORAL ARGUMENT REQUESTED**

**SCHEDULING STIPULATION TO  
FOLLOW**

TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that at the earliest practical date to be set by the Court, Plaintiffs

United Farm Workers, UFW Foundation, Irene Mendoza, Claudia Garcia, Cristano Serrano, Yesenia

Contreras Cervantes, Jose Cruz, Jane Doe I, Jane Doe II, John Doe I, Francisco Alvares Flores, Juan

Manuel Flores Ayala, Aaron Grimaldo, Margaret DeAnda Magallon, Carina Martinez, Evelyn Medina,

Isabel Rinton Panfilo, Celeste Whittle, Fortino Lopez, and Jesus Lopez, by and through their attorneys,

1 respectfully move the Court for a stay of, and preliminary injunction preventing Defendants United  
2 States Department of Labor (“DOL”), Lori Chavez-DeRemer, and Lori Frazier Bearden from  
3 implementing or otherwise taking any action to enforce, the Interim Final Rule DOL published in the  
4 Federal Register on October 2, 2025.

5  
6 This Motion is supported by the accompanying Memorandum of Points and Authorities, the  
7 Declarations of Teresa Romero, Irene Mendoza, Claudia Garcia, Crisanto Serrano, Fortino Lopez, Jose  
8 Cruz, and Aaron Grimaldo, and such other written or oral argument as may be presented at or before the  
9 time this motion is taken under submission by the Court.

10 Thus far, no attorney has noticed an appearance for Defendants in this matter, and thus Plaintiffs  
11 were unable to meet-and-confer with their counsel as per the Court’s standing order. Plaintiffs will serve  
12 a copy of these motion papers upon the U.S. Attorneys’ Office for the Eastern District of California, and  
13 will attempt to negotiate a mutually acceptable briefing schedule.  
14

15  
16 DATED: December 22, 2025

Respectfully submitted,

17 /s/ Kuntal Cholera

18 Kuntal Cholera\*

19 Tom Plotkin\*

20 Mark Andrews-Lee\*

Christina Coleburn\*

Lindsay Williams\*

21 Sela Carrington\*\*

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28 \*\* Pro hac vice application forthcoming

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