

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NORTH CAROLINA**

USA FARM LABOR, INC., et al.)	
)	
Plaintiffs,)	
)	PLAINTIFFS' MOTION FOR
v.)	EXPEDITED HEARING
)	
JULIE SU, et al.)	Civil Action No.: 1:23-96
)	
Defendants.)	

Plaintiffs respectfully ask the Court to hold an expedited hearing on their Motion for Preliminary Injunction. *See* Dkt. Nos. 12 (Motion) and 13 (Memorandum in Support of Motion). Plaintiffs will suffer imminent and irreparable harm without a preliminary injunction. *See* Dkt. No. 13 at 20-24. Plaintiff farms and agribusinesses will be forced to pay unlawfully high wages, causing them to lose profits, lose access to the H-2A visa program, scale back operations, and even go out of business. These consequences are well-documented in numerous declarations and the Report of Dr. Madeline Zavodny. Plaintiff USA Farm Labor will suffer a large loss of revenue as its customers stop using the H-2A program. These harms are imminent, since the Department of Labor's rule is already in force and Defendants are increasingly using non-agricultural wage rates to establish AEWG wages. Therefore, Plaintiffs respectfully request an expedited hearing on the Motion for a Preliminary Injunction. Plaintiffs' counsel conferred with Defendant's counsel who object to this Motion.

Dated: July 20, 2023

/s/ Mark Stevens

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