

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF FLORIDA

PENSACOLA DIVISION

---

**BAYOU LAWN & LANDSCAPE  
SERVICES, *et al.*,**

**Plaintiffs,**

**v.**

**THOMAS PEREZ, in his official  
capacity as United States Secretary  
of Labor, *et al.*,**

**Defendants.**

---

**Case No. 3:12-cv-00183-MCR-CJK**

**MOTION FOR LEAVE TO INTERVENE AS PARTIES DEFENDANT FOR THE  
LIMITED PURPOSE OF URGING THE COURT TO RULE ON THE PENDING  
SUMMARY JUDGMENT MOTIONS**

Applicants for Intervention Juan Manuel Sanchez-Rivera and Daniel Cuellar-Aguilar move for leave to intervene in this action for the limited purpose of urging the Court to issue a final, appealable order on the pending motions for summary judgment. Each of the Applicants has a substantial, legally protectable interest in this litigation that is distinct from the interest of the United States Department of Labor and warrants intervention as of right in accordance with Fed.R.Civ.P. 24(a)(2). In the alternative, Applicants request that the Court grant them permissive intervention under Rule 24(b)(2). The Applicants' interest in obtaining prompt judicial determination of this action is not being protected by the Department of Labor as is

demonstrated by the Department's failure to take any action to urge a final ruling in this case despite more than a year having passed since the summary judgment motions became ripe for decision.

Respectfully submitted,

*/s/ Gregory S. Schell*  
Gregory S. Schell  
Florida Bar Number 287199

*/s/ Vanessa Coe*  
Vanessa Coe  
Florida Bar Number 096788

FLORIDA LEGAL SERVICES, INC.  
508 Lucerne Avenue  
Lake Worth, Florida 33460-3819  
Telephone: (561) 582-3921  
Facsimile: (561) 582-4884

*/s/ Meredith B. Stewart*  
Meredith B. Stewart

SOUTHERN POVERTY LAW CENTER, INC.  
1055 St. Charles Avenue  
Suite 505  
New Orleans, Louisiana 70130  
Telephone: (504) 486-8982  
Facsimile: (504) 486-8947

Attorneys for Applicants for Intervention

**CERTIFICATE OF SERVICE**

I hereby certify that on November 5, 2014, a true and correct copy of the foregoing was electronically filed through the CM/ECF system. Notice of this filing will be sent by e-mail to the following parties by the Court's electronic filing system:

Robert Phillip Charrow  
Laura Metcoff Klaus  
Laura Foote Reiff  
GREENBERG TRAURIG LLP  
2101 L Street, N.W.  
Suite 1000  
Washington, D.C. 20037

Monte Benton Lake  
Wendel Vincent Hall  
C. J. LAKE, LLC  
525 – 9<sup>th</sup> Street, N.W.  
Suite 800  
Washington, D.C. 20004

Robin S. Conrad  
Rachel Bran  
National Chamber Litigation Center, Inc.  
1615 H Street, N.W.  
Washington, D.C. 20062

Geoffrey Forney  
United States Department of Justice  
450 – 5<sup>th</sup> Street, N.W.  
Washington, D.C. 20001

DATED: November 5, 2014

*/s/ Gregory S. Schell*  
Gregory S. Schell  
FLORIDA LEGAL SERVICES, INC.  
508 Lucerne Avenue  
Lake Worth, Florida 33460-3819