

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF FLORIDA
PENSACOLA DIVISION**

GABRIEL PEREZ,)	
)	No.3:14-cv-00682 MCR
Plaintiff)	
)	
v.)	
)	
THOMAS E. PEREZ, <i>et al.</i> ,)	
)	
Defendants.)	
)	

**THE SMALL AND SEASONAL BUSINESS LEGAL CENTER’S
MOTION TO INTERVENE FOR LIMITED PURPOSES**

Pursuant to Federal Rules of Civil Procedure 24(a)(2) & 24(b), the Small and Seasonal Business Legal Center (“SSBLC”) moves to intervene for the limited purposes of [1] seeking a continued stay of the Court’s injunction of March 4, 2015 so that the Court may determine whether the injunction prohibits DOL from engaging in non-legislative rule making and [2] seeking to appeal the injunction or defending it on appeal as the case may be. The SSBLC meets the standards for intervention as of right under Federal Rule of Civil Procedure 24(a)(2) as well as the standards for permissive intervention established in Federal Rule of Civil Procedure 24(b). Without intervention, the SSBLC and its members will suffer irreparable injury should the Department of Labor be able to claim that this Court prohibited it from issuing H-2B labor certifications.

A memorandum of points and authorities demonstrating that the SSBLC meets Rule 24’s standards for intervention and a proposed Order granting intervention accompany this motion.

For the foregoing reasons and those detailed in the accompanying memorandum, the SSBLC respectfully asks that its Motion to Intervene for Limited Purposes be granted.

Dated: April 14, 2015

Respectfully Submitted,

/s/ Wendel V. Hall

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CERTIFICATE OF CONSULTATION

Pursuant to Local Rule 7.1(b), Counsel for the Small and Seasonal Business Legal Center consulted with counsel for the parties with respect to this motion. DOL takes no position. Plaintiff opposes.

/s/ Wendel V. Hall

Wendel V. Hall

For the foregoing reasons and those detailed in the accompanying memorandum, the SSBLC respectfully asks that its Motion to Intervene for Limited Purposes be granted.

Dated: April 15, 2015

Respectfully Submitted,

/s/ Wendel V. Hall

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