

**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

**EXPEDITED RELIEF REQUESTED
(LR Cv 9)**

PLAINTIFFS' MOTION TO ENFORCE THE PRELIMINARY INJUNCTION

TO THE COURT AND ALL PARTIES:

Plaintiffs move the Court to enforce the preliminary injunction in this case issued on March 13, 2026. Dkt. 30. In support of this motion, Plaintiffs concurrently file a supporting memorandum and the sworn declaration of Alexandra Wheeler.

Pursuant to LR Cv 9, Plaintiffs respectfully request expedited relief. Plaintiffs and the hundreds of thousands of VA employees they represent are irreparably harmed each day that Defendants fail to comply with the preliminary injunction. **Plaintiffs respectfully request that the Court order that Defendants' opposition be filed on Tuesday, March 24, 2026, that Plaintiffs' reply brief be filed on Thursday, March 26, 2026, and any argument on the Motion to be heard as soon as is practicable for the Court.**

Pursuant to LR Cv 7(c), Plaintiffs request oral argument on this motion only to the extent it would aid the Court. Should the Court desire oral argument, Plaintiffs will be prepared to attend on short notice, particularly if such argument is held remotely.

Respectfully submitted,

LAW OFFICE OF CARLY B. IAFRATE, PC

Dated: March 20, 2026

By: /s/ Carly Beauvais Iafrate

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Dated: March 20, 2026

By: /s/ Travis Silva

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Council and American Federation of
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CERTIFICATE OF SERVICE

I hereby certify that on March 20, 2026, 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.

/s/ Jessica M. Delgadillo