

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF KENTUCKY
LEXINGTON DIVISION**

TRIPLE R FARMS, LLC,

Plaintiff,

vs.

UNITED STATES DEPARTMENT OF
LABOR, LORI CHAVEZ-DEREMER, in her
official capacity as Secretary of Labor, and
ANDREW ROGERS, in his official capacity as
Administrator of Wage and Hour Division,

Defendants.

Civil Action No. 5:26-cv-00087-REW-MAS

PLAINTIFF’S MOTION FOR PRELIMINARY INJUNCTION

Plaintiff Triple R Farms, LLC, through counsel, hereby moves for a preliminary injunction pursuant to Federal Rules of Civil Procedure 65(a) to enjoin DOL’s ongoing administrative adjudication against Triple R Farms, including the administrative hearing that is currently scheduled for September 16, 2026. In support of that motion, Plaintiff submits the attached memorandum of law, declarations, exhibits, and proposed order.

Plaintiff also notes that this Court may, under Rule 65(a)(2), consolidate a preliminary injunction hearing with the final merits, and Plaintiff would consent to convert this to a motion for summary judgment so that this Court could enter a permanent injunction and final judgment. *See* Fed. R. Civ. P. 56(b); *see also Backpage.com, LLC v. Cooper*, No. 12-cv-654-JTN, 2013 WL 1249063, at *2 (M.D. Tenn. Mar. 27, 2013).

Plaintiff also respectfully requests oral argument pursuant to Local Rule 7.1(f).

DATED this 12th day of March 2026.

Respectfully Submitted,

/s/Joseph A. Bilby

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Attorneys for Plaintiffs

** Applications to appear pro hac vice pending*

CERTIFICATE OF SERVICE

I certify that on March 12, 2026, I caused the foregoing Motion and supporting documents to be served on all parties listed below by USPS Certified Mail:

United States of America
c/o Pam Bondi, U.S. Attorney General
U.S. Department of Justice
950 Pennsylvania Avenue NW
Washington, DC 20530

United States of America
c/o Paul McCaffrey
U.S. Attorney for the Eastern District of Kentucky
260 W. Vine Street, Suite 300
Lexington, KY 40507-1612

U.S. Department of Labor
200 Constitution Avenue NW
Washington, DC 20210

Lori Chavez-DeRemer, Secretary of Labor
200 Constitution Avenue NW
Washington, DC 20210

Andrew Rodgers, Administrator U.S. Department of Labor
Wage and Hour Division
200 Constitution Avenue NW
Washington, DC 20210

In addition, Carl Wu called the Eastern District of Kentucky United States Attorney's Office to offer service by email, which was declined.

/s/ Joseph Bilby