UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA
LAFAYETTE DIVISION

TECHE VERMILION SUGAR CANE GROWERS ASSOCIATION, INC., et al., Plaintiffs, v. JULIE A. SU, et al., Defendants.	Civil Action No. 6:23-cv-00831 Judge Robert B. Summerhays Magistrate Judge Carol B. Whitehurst

MEMORANDUM OF AMICI CURIAE JESUS IGNACIO DIAZ CASTRO, RICARDO GUADALUPE ARCE RUIZ, JAMES SIMPSON, AND FARMWORKER JUSTICE IN SUPPORT OF DEFENDANTS' OPPOSITION TO MOTION FOR A PRELIMINARY INJUNCTION

TABLE OF CONTENTS

TABLE OF AUTHORITIES

Cases **Page(s)**

Statutes

Regulations

Other Authorities

INTRODUCTION

Amici Jesus Ignacio Diaz Castro, Ricardo Guadalupe Arce Ruiz, James Simpson, and Farmworker Justice submit this memorandum in support of Defendant's opposition to Plaintiffs' motion for a preliminary injunction against application of the final rule of the U.S. Department of Labor (DOL) titled *Adverse Effect Wage Rate Methodology for the Temporary Employment of H-2A Nonimmigrants in Non-Range Occupations in the United States*, 88 Fed. Reg. 12,760 (Feb. 28, 2023) ("2023 Rule"). The 2023 Rule, which revises the methodology DOL uses to determine the statutorily mandated hourly Adverse Effect Wage Rate (AEWR) for about two percent of H-2A worker positions, represents a reasonable and reasoned attempt to fulfill DOL's statutory duty to ensure that H-2A labor does not have an adverse effect on the wages of U.S. farmworkers, while responding to problems that arose under the superseded regulation. Amici largely agree with the arguments in DOL's opposition explaining that Plaintiffs have failed to establish that they are entitled to the extraordinary relief of a preliminary injunction. Amici submit this memorandum to further explain that the 2023 Rule's reliance on the Occupational Employment and Wage Statistics (OEWS) survey to set wages for occupations not included in the Farm Labor Survey (FLS) is reasonable and is designed to close a loophole that certain employers exploited to pay lower wages, and to emphasize that any preliminary relief should be conditioned on posting security to protect potentially injured workers.

INTERESTS OF AMICI CURIAE

Amici Diaz Castro and Arce Ruiz are truck drivers and citizens of Mexico. They have been employed in the United States as guestworkers under the H-2A program and expect to be so employed in the future. Their duties typically involve driving trucks off farm property to haul agricultural commodities to market, to processing or packing facilities, or to storage. Each has

worked as an H-2A sugarcane hauler in Louisiana, driving heavy trucks to transport harvested sugarcane from farms to a mill for processing. They are among the plaintiffs in *Alvarez Barron v. Sterling Sugars Sales Corp.*, No. 6:21-cv-03741 (W.D. La.), a case currently pending before this Court. Had the 2023 Rule been in effect at the time they worked for Sterling Sugars, the plaintiffs in *Alvarez Barron* would have been paid an AEWR based on the Louisiana wage for Heavy and Tractor-Trailer Truck Drivers (SOC Code 53–3032), rather than an AEWR based on the Louisiana wage for Agricultural Equipment Operators (SOC Code 45–2091). Currently, the former is $23.16 per hour and the latter is $13.67 per hour. *Compare* BLS, *May 2022 State Occupational Employment and Wage Estimates: Louisiana*, https://www.bls.gov/oes/current/oes_la.htm, *with Labor Certification Process for the Temporary Employment of Foreign Workers in Agriculture in the United States: Adverse Effect Wage Rates for Non-Range Occupations in 2023*, 87 Fed. Reg. 77,142, 77,143 (Dec. 16, 2022).

Amicus James Simpson is a U.S. citizen who resides in Sunflower, Mississippi. He earns his living as a truck driver, hauling harvested agricultural commodities over public highways from farms to storage or processing facilities. For more than a decade, he has worked for a grower participating in the H-2A program and plans to either return to that job or accept other work as a truck driver for another H-2A grower in his area this harvest season. In practice, the AEWR serves as the minimum wage for this work. *See* 20 C.F.R. § 655.120(a) (providing that an H-2A employer must pay the highest of the AEWR, any prevailing wage rate, the collective bargaining wage, the federal minimum wage, or the state minimum wage). Under the methodology required by the 2023 Rule, the current AEWR for his occupation, which is light truck driver (SOC Code 53-3033), is $20.42 per hour, which is higher than the AEWR of $13.67 per hour for Agricultural Equipment Operators (SOC Code 45–2091) which would have applied under the former regulation. *Compare*

BLS, *May 2022 State Occupational Employment and Wage Estimates: Mississippi*, https://www.bls.gov/oes/current/oes_ms.htm, *with* 87 Fed. Reg. 77,142.

Amicus Farmworker Justice is a nonprofit organization that seeks to empower migrant and seasonal farmworkers to improve their living and working conditions, immigration status, health, occupational safety, and access to justice. Farmworker Justice accomplishes these aims through policy advocacy, litigation, training and technical assistance, coalition-building, and public education. Farmworker Justice represents and provides services to U.S. workers and H-2A workers whose wages will be determined by the 2023 Rule.

BACKGROUND

The H-2A program was created by the Immigration and Nationality Act (INA), 8 U.S.C. § 1188, and is implemented, as relevant here, through regulations set out at 20 C.F.R. §§ 655.100 to 655.185 and 29 C.F.R. §§ 501.0 to 501.47. The H-2A program authorizes the admission of nonimmigrant workers to perform agricultural labor or services of a temporary nature. An agricultural employer in the United States may import foreign workers to perform such labor if DOL certifies that (1) there are insufficient available workers within the United States to perform the job, and (2) the employment of foreign workers will not adversely affect the wages and working conditions of similarly situated U.S. workers. 8 U.S.C. §§ 1101(a)(15)(H)(ii)(a) and 1188(a)(1), and 20 C.F.R. § 655.100. Individuals admitted in this fashion are commonly referred to as H-2A workers.

Eligible employers must complete a multi-step process to participate in the H-2A program. Prior to filing a petition with U.S. Citizenship and Immigration Services (USCIS), a division of the Department of Homeland Security, the employer must obtain a temporary labor certification from DOL's Office of Foreign Labor Certification. DOL must certify that "there are not sufficient

workers who are able, willing, and qualified, and who will be available at the time and place needed, to perform the labor or services involved in the petition," and that "the employment of the alien in such labor or services will not adversely affect the wages and working conditions of workers in the United States similarly employed." 8 U.S.C. § 1188(a)(1).

DOL regulations have long set out the requirements for obtaining a temporary labor certification. The application must include a job offer, commonly referred to as a "clearance order" or "job order." 20 C.F.R. § 655.121(a)(1). To ensure DOL complies with its statutory duty to ensure that the H-2A program does not depress the wages of U.S. agricultural workers, DOL regulations set minimum levels for benefits, wages, and working conditions to be included in the offer. 20 C.F.R. §§ 655.120, .122, .135. Among these regulations is the "offered wage" rate provision, which requires that for every hour or portion thereof worked during a pay period, the employer must pay the workers the highest applicable wage. 20 C.F.R. § 655.120, .122(l). For purposes of this lawsuit, that wage is the AEWR. The AEWR is designed to follow trends of the agricultural labor market, adjusting to meet wage averages as determined by supply and demand. In the absence of a separate contract between the H-2A employer and the worker, the clearance order, with the offered wage rate, is the contract. 20 C.F.R. § 655.122(q). The employer must pay this wage not only to H-2A workers, but also to U.S. workers in corresponding employment. *See* 20 C.F.R. § 655.103(b), .182(d)(1)(i).

Since 1987, except for an 18-month period in 2009-2010, DOL has set the AEWR using the annual Farm Labor Survey (FLS) conducted by the U.S. Department of Agriculture. Under the 2023 Rule, the AEWR for the "vast majority" of agricultural workers in non-range occupations, which includes about 98 percent of H-2A job opportunities, will continue to be based on the average hourly wage rate for "field and livestock worker[s]" for a state or region as reported by

the FLS. 88 Fed. Reg. at 12,760, 12,766–69; *accord* 20 C.F.R. § 655.120(b)(1)(i)(A) (codifying this principle). When FLS wage data is not available for field and livestock workers in a particular area, DOL will generally use Occupational Employment and Wage Statistics (OEWS) survey reports to set the AEWR for such field and livestock workers. 88 Fed. Reg. at 12,769–70; *accord* 20 C.F.R. § 655.120(b)(1)(i)(B)–(C) (codifying this principle). DOL will continue to apply a single AEWR to all such H-2A jobs certified in a state. *See* 88 Fed. Reg. at 12,761.

For certain specialty occupations not in the category of field and livestock workers, such as supervisors, farm construction workers, farm mechanics, and truck drivers, the 2023 Rule sets AEWRs for each state using the applicable Standard Occupational Classification (SOC) code for the occupation. 88 Fed. Reg. at 12,770–71; *see also* 20 C.F.R. § 655.120(b)(1)(ii) (codifying this principle). DOL anticipates that the AEWR for workers in these SOC codes will increase more as compared to the AEWR increases for workers whose AEWRs are set by the FLS. 88 Fed. Reg. at 12,771–72.

DOL issued the 2023 Rule to fix two methodological flaws in the prior rule that resulted in an adverse effect on the wages of U.S. farmworkers. *Id.* at 12,761. First, the former rule's use of FLS wage data for field and livestock workers to set a single AEWR for each state, including for jobs such as truck drivers in SOC codes not encompassed by the field and livestock classification and not included in the FLS, did not reflect the actual wages of workers in those excluded SOC codes, which "generally account for more specialized or higher paid job opportunities." *Id.* The rule thus failed adequately to guard against an adverse effect on wages. *Id.* Second, relying solely on FLS data did not permit DOL to set AEWRs for all geographical areas in the United States. *Id.* at 12,761–62.

Correcting these flaws, the 2023 Rule, by using the OEWS as an additional data source to determine AEWRs where the FLS does not provide relevant information, takes a "reasonable approach," *id.* at 12,762, to balancing the interests of growers and farmworkers. It ensures "that the employment of H-2A workers will not have an adverse effect on the wages of agricultural workers in the United States similarly employed, while ensuring that employers can access legal agricultural labor," and it accommodates DOL's need for "the sound administration of the H-2A program in deciding how to administer the AEWR." *Id.* at 12,761.

ARGUMENT

I. DOL's use of an OEWS-based AEWR for occupations not included in the FLS is reasonable.

Through the INA, Congress has entrusted DOL with defining "adverse effect" and addressing how it should be measured. *AFL-CIO v. Brock*, 835 F.2d 912, 914 (D.C. Cir. 1987). DOL has broad discretion to set AEWRs in accordance with "any number of reasonable formulas," and its choice of rates is entitled to deference. *Fla. Fruit & Vegetable Ass'n. v. Brock*, 771 F.2d 1455, 1459–60 (11th Cir. 1985); *see also Va. Agric. Growers Ass'n v. Donovan*, 774 F.2d 89, 93 (4th Cir. 1985) (upholding DOL's choice of AEWR methodology).

Plaintiffs do not dispute that wage rates vary for different agricultural occupations and that the FLS-based AEWR for combined field and livestock workers is limited to a subset of only six SOC codes.[1] Accordingly, the FLS can, in Plaintiffs' words, provide "the best source of information for agricultural wages," Pls.' Mem. 3, only for the six occupations included in the

[1] The SOC codes associated with the field and livestock workers (combined) category (sometimes referred to as "the Big Six"), and which will continue to be subject to FLS-based AEWRs, are: (1) 45-2041 Graders and Sorters, Agricultural Products; (2) 45-2091 Agricultural Equipment Operators; (3) 45-2092 Farmworkers and Laborers, Crop, Nursery and Greenhouse; (4) 45-2093 Farmworkers, Farm, Ranch, and Aquacultural Animals; (5) 53-7064 Packers and Packagers, Hand; and (6) 45-2099 Agricultural Workers – Other.

survey, which cover the vast majority of H-2A job opportunities. The FLS is silent as to wage rates for SOC codes for other occupations. Under the 2023 Rule, DOL will use OEWS data to calculate the AEWR only for occupations that are *not* included in the FLS. The decision to use OEWS data where FLS data is unavailable is reasonable and will affect only about two percent of H-2A jobs. For those two percent, use of OEWS data for occupations not included in the FLS will fulfill DOL's statutory responsibility to ensure that the employment of H-2A workers will not depress the wages of U.S. workers similarly employed.

The OEWS includes workers in the agricultural sector whose occupations are not included in the FLS. Plaintiffs emphasize that OEWS wage data includes information about workers in all sectors of the economy, but they fail to acknowledge that the OEWS collects wage data from farm labor contractors that support fixed-site agricultural employers. For example, many H-2A labor contractors employ H-2A workers to drive heavy trucks to provide hauling services to farmer customers. None of the workers paid by such H-2A labor contractors is included in the FLS, but the wages paid to such workers is included in the OEWS. The chart attached as Exhibit A reflects a sample of job orders filed by H-2A labor contractors that employ H-2A workers to drive heavy trucks.

In the past, DOL relied on FLS data in large part because farm owners and operators employed a substantial majority of the nation's farmworkers. *See Temporary Agricultural Employment of H-2A Aliens in the United States: Final Rule*, 75 Fed. Reg. 6,844, 6,901 (Feb. 12, 2010). However, as noted in the 2023 Rule, there has been a steady increase in the percentage of farmworkers hired through labor contractors. In 2008, farm labor contractors hired an estimated 30 percent of farmworkers in H-2A jobs. *See Temporary Agricultural Employment of H-2A Aliens in the United States; Modernizing the Labor Certification Process and Enforcement: Final Rule*,

73 Fed. Reg. 77,110, 77,174 (Dec. 18, 2008). By 2022, this percentage had increased to 43 percent. *See* 88 Fed. Reg. 12,760, 12,770 n.60.

As Plaintiffs point out, for an 18-month period in 2009-2010, DOL computed the AEWR for all H-2A workers using the OEWS. *See* Pls.' Mem. 4 n.8. Although the OEWS at that time was based on the wages of less than a third of farmworkers, DOL's use of the dataset was upheld. *United Farm Workers v. Solis*, 697 F. Supp. 2d 5, 10 (D.D.C. 2010) (holding that the agency provided "an explanation that is reasonable and consistent with the regulation's language and history, thus supporting the DOL's objectives") (citation and internal quotation marks omitted). In issuing the 2023 Rule, DOL considered the available sources of information and, relying on its expertise, selected the OEWS as the data source best suited to prevent an adverse effect on the wages of workers in occupations not included in the FLS. Nothing more is required.

Part of the impetus for the 2023 Rule was to close a loophole that had allowed employers to pay H-2A workers as though they were performing general farmworker duties such as picking crops in the field, even when their work consisted entirely of higher-skilled work such as driving heavy trucks over public roads, which involves "the same or similar skills, qualifications, and tasks, whether the commodity is agricultural or nonagricultural in nature." 88 Fed. Reg. 12,782. Indeed, some employers shifted their fleet of heavy truck drivers from U.S. workers to H-2A workers to take advantage of the flaw in the prior rule and pay the drivers as though they were field laborers rather than drivers of heavy trucks. The exploitation of this loophole undermines the goals of the H-2A wage protections, which aim to prevent employers from using the H-2A program to drive down wages or replace U.S. workers with H-2A workers.

The *Alvarez Barron* case pending in this Court provides an example. There, prior to 2018, a sugar mill and its related entities employed U.S. workers as heavy truck drivers to transport

harvested sugarcane from dozens of independent sugarcane farms in Louisiana back to the mill. *See* Plaintiffs' Statement of Undisputed Material Facts, Facts 21–23, *Alvarez Barron v. Sterling Sugar Sales Corp.*, No. 6:21-cv-03741 (W.D. La. June 30, 2023), ECF No. 103-2. Beginning in 2018, the mill began using a subsidiary as an H-2A labor contractor to employ foreign guestworkers to do that work. *Id.*, Facts 33, 41. Seizing on the fact that the prior rule provided for H-2A workers to be paid an AEWR based on the six agricultural occupations included in the FLS, the employer paid the workers the AEWR for H-2A farmworkers rather than the wage rates from the OEWS for heavy truck drivers.[2] *Id.*, Facts 103, 143.

The 2023 Rule aims to stop such abuses and to prevent an adverse effect on the wages of similarly employed U.S. workers by requiring H-2A employers to pay the OEWS wage rates associated with specialized jobs that require greater skills than the occupations included in the FLS.

II. If an injunction is issued, Plaintiffs must provide adequate security to workers.

If the Court concludes that Plaintiffs have carried their burden to show entitlement to a preliminary injunction, any injunction should be crafted to preserve the ability of farmworkers to recover wages that will be owed if the 2023 AEWRs ultimately take effect. *See, e.g.*, *Trump v. Int'l Refugee Assistance Project*, 137 S. Ct. 2080, 2087 (2017) ("[A] court need not grant the total relief sought by the applicant but may mold its decree to meet the exigencies of the particular

[2] The plaintiffs in *Alvarez Barron* also argue that the truck-driving work performed by the H-2A workers for the labor contractor was not agricultural and, thus, under the terms of the workers' H-2A contracts and the H-2A regulations, they were entitled to overtime and the OEWS rate paid to H-2B non-agricultural workers. They further allege that their employer was emboldened to pay the unlawfully low AEWR by holding itself out to DOL as an agricultural employer employing workers in agricultural field work, despite that the plaintiff H-2A workers performed no such work. *See* Plaintiffs' Memorandum in Support of Motion for Partial Summary Judgment, *Alvarez Barron v. Sterling Sugar Sales Corp.*, No. 6:21-cv-03741 (W.D. La. June 30, 2023), ECF No. 103-1.

case.") (citation and internal quotation marks omitted). Rather than the broad order that Plaintiffs request enjoining enforcement of the 2023 Rule in its entirety, the Court should condition any injunction on Plaintiffs' agreement to the following conditions:

> (1) that all employers submitting H-2A labor certification applications subject to such an injunction pay the 2023 AEWR (if it is upheld) retroactively to all H-2A and similarly employed U.S. workers;
>
> (2) that all employers applying for or obtaining H-2A labor certification applications subject to such an injunction agree to (a) pay the difference between the 2023 AEWR (or the wage actually paid if higher) and the current AEWR for each hour worked into an escrow account (or post security for that amount) on a monthly basis as the wages are earned, and (b) preserve the wage records supporting the amount escrowed or secured until this case is concluded and the escrow funds disbursed to employers or to workers; and
>
> (3) that all employers applying for or obtaining H-2A labor certification applications subject to such an injunction notify their workers (a) of the existence of the escrow or security and the promise to pay the 2023 wage when established, and (b) of the importance of keeping their employers and the parties to this suit informed of any changes at their permanent home addresses in their countries of origin, telephone numbers, and email addresses.

Such conditions would be adequate to protect the interests of Plaintiffs because, if the lawsuit is successful, employers will recover promptly any escrowed or secured funds, with interest, that exceed the lawful AEWR as determined by this Court. At the same time, these conditions are needed to protect agricultural workers because, if Plaintiffs do not prevail, the workers will be able to recover the disputed wages. Although there is no doubt that a preliminary injunction will nonetheless harm the workers—because they will only be able to compete for jobs on the basis of a *promise* to pay the 2023 AEWR when it is ultimately established, rather than receive payment of that wage as it is earned—the above conditions would reduce that harm.

These conditions are not novel. Courts have imposed such conditions on preliminary injunctions on behalf of employers challenging DOL wage rates for temporary foreign workers. For example, in *Virginia Agricultural Growers Ass'n v. Donovan*, 597 F. Supp. 45, 47 (W.D. Va.

1985), tobacco growers sought to challenge the validity of DOL's AEWR methodology. The employers sought temporary and preliminary relief from the wage rate for the same reasons that Plaintiffs here do—*i.e.*, once they paid the wages calculated pursuant to the challenged methodology, there would be no way to recover the wages if the AEWR methodology was ultimately found to be unlawful. The Court granted the injunction, but to ensure that workers (including workers recruited in the meantime) would receive the wages if the rate was ultimately upheld, the court required the employers to agree in their labor certification applications to pay the AEWR ultimately approved by the court. Logistically, this required placing the disputed wages in an escrow account monthly or, alternatively, providing bank letters of credit sufficient to cover the wages and interest on the wages. *See Va. Agric. Growers Ass'n, Inc. v. Donovan*, Civ. No. 83-0146-D, Temporary Injunction Order for 1985, at 3–5 (W.D Va. Apr. 26, 1985) (attached as Ex. B). In addition, the order required the employers to obtain the addresses of all workers whose wages were being escrowed and to provide workers with a notice explaining the escrow account and the need for the workers to keep their employer informed of their addresses until the case was resolved. *Id.* at 5–6. DOL's AEWR methodology was ultimately upheld, *Donovan*, 774 F.2d at 89, and the escrow funds were distributed to the workers. Preliminary injunctions were granted in similar challenges to the 1983 AEWR methodology in other circuits, *see, e.g.*, *Fla. Fruit & Vegetable Ass'n*, 771 F.2d 1455; *Shoreham Coop. Apple Producers Ass'n v. Donovan*, 764 F.2d 135 (2d Cir. 1984), and in both challenges, the lower courts conditioned the injunction on escrow requirements similar to those ordered in the Fourth Circuit case.

In *Frederick County Fruit Growers Ass'n v. Brock*, Civ. No. 85-0142-D (W.D. Va. Dec. 17, 1985), apple and tobacco employers challenged the legality of DOL's H-2A piece rate rule. The court granted an injunction but conditioned it on the employers' escrowing the disputed wages

as they were earned, maintaining records, and providing notice to workers explaining the existence of the escrow account. *Id.*, Temporary Restraining Order ¶¶ 1–4 (attached as Ex. C). To ensure that the order was complied with, the court required the employers to obtain signed acknowledgements from their workers stating that they had received the notices. *Id.* ¶ 4. A similar injunction conditioned on escrowing disputed piece rates was entered in *Tri-County Growers v. Brock*, Civ. No. 85-0038-M, Order at 2–5 (N.D. W.Va. Aug. 28, 1985) (attached as Ex. D). The escrow funds in both cases were ultimately paid to the workers when the D.C. Circuit upheld DOL's piece rate rule, *see Frederick Cty. Fruit Growers Ass'n v. Martin*, 968 F.2d 1265, 1276 (D.C. Cir. 1992), and the Fourth Circuit dissolved the *Tri-County Growers* injunction, *see Feller v. Brock*, 802 F.2d 722, 731 (4th Cir. 1986) (ordering "immediate distribution of the funds escrowed pursuant to this injunction"); *see also NAACP v. Donovan*, 558 F. Supp. 218, 225–26 (D.D.C. 1982) (in challenge to DOL's failure to promulgate 1982 AEWRs, granting final relief and ordering funds escrowed by employers pursuant to preliminary injunction to ensure payment of 1982 AEWR, once set, to be paid to workers); *Freeman v. USDA*, 350 F. Supp. 457, 461–62 (D.D.C. 1972) (in challenge to Department of Agriculture's failure to issue a "fair and reasonable wage" for 1971 as required by the Sugar Act, entering a preliminary injunction restraining the agency "from making any further subsidy payments" to employers to ensure that employers reimbursed workers for the difference between the wage paid and the lawful 1971 wage, to be later set, for work already performed).

Here, if a preliminary injunction were granted, similar conditions would be critical to ensure that workers received the disputed wages if the injunction were dissolved or reversed on appeal. Without such conditions, Plaintiffs would escape liability for the 2023 AEWR, even if that

rate were later upheld by the Court. That result is exactly the sort of adverse effect on U.S. workers that the statute is designed to prohibit.

CONCLUSION

Plaintiffs' motion for preliminary injunctive relief should be denied. In the event that such relief is granted, the injunction should impose the conditions stated above.

Dated: July 28, 2023

Respectfully submitted,

s/ Michael T. Kirkpatrick
Michael T. Kirkpatrick
Trial Attorney
D.C. Bar No. 486293
Public Citizen Litigation Group
1600 20th St. NW
Washington, DC 20009
Telephone: (202) 588-7728
e-mail: mkirkpatrick@citizen.org
(*Pro Hac Vice* application forthcoming pursuant to LCvR 83.2.6)
Attorney for Proposed Amici

Douglas L. Stevick
Texas Bar No. 0079498
Texas RioGrande Legal Aid, Inc.
300 S. Texas Blvd.
Weslaco, TX 78596
Telephone: (956) 982-5557
Facsimile: (956) 591-8752
e-mail: dstevick@trla.org
(*Pro Hac Vice* application forthcoming pursuant to LCvR 83.2.6)
Attorney for Proposed Amici Diaz Castro, Arce Ruiz, and Simpson

Mary Yanik
Louisiana Bar No. 36973
Tulane Immigrant Rights Clinic
6329 Freret St, Suite 130
New Orleans, Louisiana 70118-6248
Telephone: (504) 865-5153

Facsimile: (504) 862-8753
myanik@tulane.edu
Admitted to Practice in W.D. La
Attorney for Proposed Amici