

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
CALIFORNIA

Wonderful Nurseries LLC v. Agricultural Labor Relations Board

No. No. 1:24-cv-01601-KES-CDB, United States District Court for the Eastern District of California (May 13, 2025)

SUMMARY

The United States District Court for the Eastern District of California grants the United Farm Workers of America’s motion to intervene as of right in Wonderful Nurseries LLC’s constitutional challenge to California’s mandatory mediation and conciliation provisions. The court denies the employees’ motion to intervene as of right because they did not show practical impairment of their interests, but grants permissive intervention. The action concerns California’s Agricultural Labor Relations Act and the relationship between agricultural employers, labor unions, employees, and the Agricultural Labor Relations Board.

CASE DETAILS

COURT	United States District Court for the Eastern District of California
JURISDICTION	United States District Court for the Eastern District of California
DECIDED	May 13, 2025
DOCKET	No. 1:24-cv-01601-KES-CDB
DISPOSITION	other
PROCEDURAL POSTURE	Order resolving motions by the United Farm Workers of America and agricultural employees to intervene in Wonderful Nurseries LLC's federal constitutional challenge to California's mandatory mediation and conciliation statutes.
STANDARD OF REVIEW	Intervention as of right under Rule 24(a)(2) requires a timely motion, a significantly protectable interest, potential practical impairment of that interest, and inadequate representation. Permissive intervention under Rule 24(b) requires an independent jurisdictional basis, timeliness, and a common question of law or fact, subject to the court's discretion and consideration of undue delay or prejudice.
PRECEDENTIAL VALUE	unpublished district court order; persuasive authority only
PARTIES	Wonderful Nurseries LLC v. Agricultural Labor Relations Board, United Farm Workers of America, Claudia Chavez, Maria Ester

Gutierrez, Francisco Antonio, Erik Ferrer Chacon, Maria Chacon, Florentina Torres Cruz, Ines Cruz, Gloria Gonzales, Lorenzo Hernandez, Selene Lizzaraga, Yolanda Martinez, Ana Molina, Leticia Navarro, Ana Ortiz, Maria C. Pedro, Jose Ruiz, Maria C. Sanchez, Angelina Torres, Etelverto Torres, Domatila Vasquez

TOPICS

intervention civil procedure due process free speech constitutional law

PRACTICE AREAS

civil procedure constitutional law administrative law labor law

QUESTIONS PRESENTED

1. Whether UFW satisfied the requirements for intervention as of right under Federal Rule of Civil Procedure 24(a)(2).
2. Whether the employees satisfied the requirements for intervention as of right under Rule 24(a)(2), including the significant-protectable-interest and practical-impairment requirements.
3. Whether the employees should be allowed to intervene permissively under Rule 24(b).

HOLDINGS

1. UFW is entitled to intervene as of right because its motion was timely, it possessed a significant protectable interest in the challenged MMC statutory scheme, disposition of the action could practically impair that interest, and the ALRB's representation of UFW's narrower labor-union interests may be inadequate.
2. The employees may have significant protectable interests in the litigation, but they are not entitled to intervene as of right because they failed to show that disposition of the action may practically impair or impede their ability to protect those interests.
3. The employees satisfy the requirements for permissive intervention under Rule 24(b), and intervention will not unduly delay or prejudice the original parties.

KEY QUOTATIONS

"To satisfy the requirements of Rule 24(a)(2), a prospective intervenor bears the burden of establishing that: (1) its motion is timely; (2) it has a significantly protectable interest relating to the subject of the action; (3) it is so situated that the disposition of the action may as a practical matter impair or impede its ability to protect that interest; and (4) its interest is inadequately represented by the parties to the action." (at 2)

"A "district court has discretion to permit intervention when the movant presents '(1) an independent ground for jurisdiction; (2) a timely motion; and (3) a common question of law and fact between the movant's claim or defense and the main action.'"" (at 12)

FACTUAL BACKGROUND

Wonderful, a producer of grapevines and trees, challenged California Labor Code section 1164 et seq., the mandatory mediation and conciliation provisions of the Agricultural Labor Relations Act. The challenge arose from a labor-relations process involving UFW, which had been certified as the exclusive bargaining representative of Wonderful's agricultural workers. UFW sought to intervene to defend the MMC provisions, while thirteen employees sought to intervene to assert interests concerning union representation, union-security provisions, speech and association, and due process. After UFW withdrew its MMC request and the ALRB stated that no further MMC proceedings were expected, the court resolved the intervention motions at an early stage of the litigation.

PROCEDURAL HISTORY

Wonderful filed this action on December 30, 2024, challenging provisions of the California Agricultural Labor Relations Act governing mandatory mediation and conciliation. UFW moved to intervene as a defendant, and the employees moved to intervene as plaintiffs, both under Federal Rule of Civil Procedure 24. The court granted UFW intervention as of right, denied the employees' motion to intervene as of right, and granted the employees permissive intervention.

DISPOSITION

other

CASES CITED

- U.S. ex rel. Eisenstein v. City of New York, New York, 556 U.S. 928, 933
- Marino v. Ortiz, 484 U.S. 301, 304
- NAACP v. New York, 413 U.S. 345, 365
- Sweet v. Cardona, 121 F.4th 32, 47-48
- Kalbers v. United States Department of Justice, 22 F.4th 816, 822, 828 n.9
- Perry v. Proposition 8 Official Proponents, 587 F.3d 947, 950
- Cooper v. Newsom, 13 F.4th 857, 865, 868
- United States v. Alisal Water Corp., 370 F.3d 915, 919
- Hoopa Valley Tribe v. United States Bureau of Reclamation, 648 F. Supp. 3d 1196, 1200
- Citizens for Balanced Use v. Montana Wilderness Association, 647 F.3d 893, 897-898
- Arakaki v. Cayetano, 324 F.3d 1078, 1084, 1086-1087
- Gerawan Farming, Inc. v. Agricultural Labor Relations Board, 3 Cal. 5th 1118, 1130-1132
- W. Watersheds Project v. Haaland, 22 F.4th 828, 840
- Callahan v. Brookdale Senior Living Communities, Inc., 42 F.4th 1013, 1020-1022
- Berger v. North Carolina State Conference of the NAACP, 597 U.S. 179
- League of United Latin American Citizens v. Wilson, 131 F.3d 1297, 1302, 1305, 1308
- Allied Concrete & Supply Co. v. Baker, 904 F.3d 1053, 1067-1068

- S. California Healthcare Systems, Inc. v. City of Culver City, No. 221CV05052MCSRAO, 2021 WL 4817846, at *2
- Donnelly v. Glickman, 159 F.3d 405, 409-412
- Greene v. United States, 996 F.2d 973, 976
- County of Fresno v. Andrus, 622 F.2d 436, 438
- Gerawan Farming, Inc. v. Agricultural Labor Relations Board, 23 Cal. App. 5th 1129, 1210
- United States v. City of Los Angeles, Cal., 288 F.3d 391, 397-398
- Forest Conservation Council v. U.S. Forest Service, 66 F.3d 1489, 1496 n.8
- Gerawan Farming, Inc. v. Agricultural Labor Relations Board, 52 Cal. App. 5th 141, 169
- Freedom from Religion Foundation, Inc. v. Geithner, 644 F.3d 836, 843
- Donnelly v. Glickman, 159 F.3d 405, 412

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