

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

**ORLANDO MÉNDEZ LÓPEZ;
JOSÉ COTTO MELÉNDEZ;
JOSÉ A. RAMOS RAMOS;
CIPRIÁN CENTENO RODRIGUEZ;
JULIO OLIVARI;
ANDRÉS SANTIAGO RIVERA;
ÁNGEL CLASS SANTIAGO;
DANIEL MALDONADO;
JAVIER RODRIGUEZ SANTIAGO;
JUAN A. VELAZQUEZ RIVERA;
JAVIER MEJÍAS;
REINALDO SANTOS;
ENRIQUE LEÓN RODRIGUEZ;
JAVIER RAMIREZ RIVERA;
ELISAMUEL ROBLES SÁNCHEZ;
DAVID RODRIGUEZ;
FÉLIX PÉREZ ANDÚJAR;
RIGOBERTO LÓPEZ;
RENÉ SANTIAGO GARCIA,**

Plaintiffs,

v.

**UNIVERSITY OF PUERTO RICO;
ZAYIRA JORDÁN, in her official
capacity as President of the University of
Puerto Rico; UNIVERSITY OF
PUERTO RICO WORKERS' UNION**

Defendants.

CIVIL NO. 25-01682 (SCC)

Constitutional Violation Action (42
U.S.C. § 1983), Declaratory Judgment,
Injunctive Relief, Compensatory,
Nominal, and Punitive Damages. Jury
Trial Demanded.

MOTION FOR JUDGMENT ON THE PLEADINGS

TO THE HONORABLE COURT:

Comes now, Plaintiffs Orlando Méndez López (“Méndez”), José Cotto Meléndez (“Cotto”), José A. Ramos Ramos (“Ramos”), Ciprián Centeno Rodriguez (“Centeno”), Julio Olivari (“Olivari”), Andrés Santiago Rivera (“Santiago Rivera”), Ángel Class

Santiago (“Class”), Daniel Maldonado (“Maldonado”), Javier Rodriguez Santiago (“Rodriguez Santiago”), Juan A. Velazquez Rivera (“Velazquez”), Javier Mejías (“Mejías”), Reinaldo Santos (“Santos”), Enrique León Rodriguez (“León”), Javier Ramirez Rivera (“Ramirez”), Elisamuel Robles Sánchez (“Robles”), David Rodriguez (“Rodriguez”), Félix Pérez Andújar (“Pérez”), Rigoberto López (“López”), and René Santiago Garcia (“Santiago Garcia”) (collectively, “Plaintiffs”), through the undersigned counsel, pursuant to Federal Rule of Civil Procedure 12(c), respectfully submit their Motion for Judgment on the Pleadings, as follows:

1. Plaintiffs respectfully request that the Honorable Court enter judgment on the pleadings in their favor by granting the requested relief in the Amended Complaint’s First Count.

2. The Court should grant Plaintiffs’ Motion for Judgment on the Pleadings on the First Count because it is unconstitutional for the University of Puerto Rico to discriminate and coerce membership in a union, depriving Plaintiffs of their First Amendment rights of free speech and association, as secured against infringement by the Fourteenth Amendment to the United States Constitution and 42 U.S.C. § 1983.

3. The Court should award Plaintiffs injunctive, declaratory, and equitable relief, and attorneys’ fees under 42 U.S.C. § 1988 as discussed in Plaintiffs’ Memorandum in Support of Motion for Judgment on the Pleadings.

4. In support of their Motion, Plaintiffs have filed concurrently herewith a Memorandum in Support of Motion for Judgment on the Pleadings.

CERTIFICATE OF SERVICE

I hereby certify that on this date I electronically filed the foregoing with the Clerk of Court, using the CM/ECF System, which will send notification of such filing to all appearing parties and counsel using the Court's electronic filing system.

RESPECTFULLY SUBMITTED.

Dated: May 29, 2026

s/ ÁNGEL J. VALENCIA

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