

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO

**LUIS RIGAU,**

Plaintiff,

v.

**MARÍA T. QUINTANA, in her official  
capacity as Chair of the Puerto Rico  
Industrial Commission; PUERTO RICO  
INDUSTRIAL COMMISSION;  
FEDERACIÓN CENTRAL DE  
TRABAJADORES, UFCW LOCAL 481,**

Defendants.

**Civil No. 25-1630 (PAD-HRV)**

**RE: Constitutional Violation Action (42  
U.S.C. § 1983), Declaratory Judgment,  
Injunctive Relief, Compensatory, and  
Nominal Damages**

**MOTION FOR LEAVE TO SUPPLEMENT THE PUERTO RICO INDUSTRIAL  
COMMISSION AND ITS CHAIR'S MOTION TO DISMISS AT DOCKET NO. 53**

**TO THE HONORABLE COURT:**

COME NOW codefendants María T. Quintana, in her official capacity as Chair of the Puerto Rico Industrial Commission and the Puerto Rico Industrial Commission, through the undersigned attorneys, and without waiving any right or defense and without submitting to the Court's jurisdiction, very respectfully state, allege and pray as follows:

1. The Puerto Rico Industrial Commission and its Chair ("Defendants") move this Court for leave to supplement its pending Motion to Dismiss (Dkt. No. 53), less than a week after Plaintiff filed his Surreply (Dkt. No. 77).<sup>1</sup>

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<sup>1</sup> Attached to this motion are the Motion to Supplement Motion to Dismiss and accompanying exhibit.

2. An additional ground to dismiss the case against the Defendants has recently arisen which warrants a supplemental brief. This is because the Puerto Rico Industrial Commission has stopped deducting union dues from Plaintiff's wages, starting on the payment cycle covering April 16 to 30, 2026. Since the Court can no longer provide the Plaintiff any meaningful relief concerning these Defendants, the instant case has become moot against the Puerto Rico Industrial Commission and its Chair.

3. Defendants pray to the Court for leave to file the attached motion to supplement the motion to dismiss filed at Docket No. 53 and brief the Court concerning this matter for the proper disposition of this case.

4. The First Circuit has held that supplementing the record helps courts and litigants avoid pointless formality and supplementation is proper when doing so will promote the economic and speedy disposition of the controversy between the parties, will not cause undue delay or trial inconvenience, and will not prejudice the rights of any other parties to the action. *United States ex rel. Gadbois v. PharMerica Corp.*, 809 F.3d 1, 4 (1st Cir. 2015) (citing *Predator Int'l, Inc. v. Gamo Outdoor USA, Inc.*, 793 F.3d 1177, 1186-87 (10th Cir. 2015)). See also: *Bean Maine Lobster, Inc. v. Monterey Bay Aquarium Foundation*, Civil No. 23-00129 (JAW), 2024 WL 4993554, at \*4 (holding it proper to grant parties' motions to supplement under Fed. R. Civ. P. 15(d)).

5. Presently, the Court has not ruled on the pending Motion to Dismiss and, thus, Plaintiff's rights will not be prejudiced if the Court grants this motion for leave to supplement the record on the motion to dismiss.

**WHEREFORE**, it is respectfully requested that this Honorable Court grant this motion for leave to supplement the record on the Motion to Dismiss filed at Docket No. 53.

**I HEREBY CERTIFY** that on this same date, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the parties subscribing to the CM/ECF system.

**RESPECTFULLY SUBMITTED.**

In San Juan, Puerto Rico on the 4th day of May 2026.

**LOURDES L. GÓMEZ TORRES**  
Secretary of Justice

**TANIA L. FERNÁNDEZ MEDERO**  
Deputy Secretary of Civil Litigation

**JOSUÉ N. TORRES-CRESPO**  
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