

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
FORT WORTH DIVISION**

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	)	
SID MILLER, on behalf of himself and others	)	
similarly situated,	)	
	)	
Plaintiff,	)	
	)	Civil Action No. 4:21-cv-595-O
v.	)	
	)	
TOM VILSACK, in his official capacity as	)	
SECRETARY OF AGRICULTURE,	)	
	)	
Defendant.	)	

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**DEFENDANT’S MOTION FOR SUMMARY JUDGMENT**

Defendants Thomas J. Vilsack, in his official capacity as Secretary of Agriculture, and Zach Ducheneaux, in his official capacity as Administrator, Farm Services Agency, by counsel and pursuant to Fed. R. Civ. P. 56, for the reasons stated in the accompanying brief, move for summary judgment on the grounds that no dispute of material fact exists and Defendants are entitled to judgment as a matter of law on all claims.

Dated: March 11, 2022

Respectfully submitted,

BRIAN M. BOYNTON  
Principal Deputy Assistant Attorney General

LESLEY FARBY  
Assistant Branch Director

/s/ Kyla M. Snow  
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**Certificate of Service**

On March 11, 2022, I electronically submitted the foregoing document using the emergency filing procedures for the U.S. District Court, Northern District of Texas. I hereby certify that I have served all parties electronically or by another manner authorized by Federal Rule of Civil Procedure 5(b)(2).

/s/ Kyla M. Snow  
KYLA M. SNOW  
United States Department of Justice