

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA**

STATE OF NEW MEXICO, *et al.*,

Plaintiffs,

v.

ELON MUSK, *et al.*,

Defendants.

C.A. No. 1:25-cv-00429

**PLAINTIFF STATES’  
SUPPLEMENTAL NOTICE IN  
SUPPORT OF MOTION FOR  
EXPEDITED DISCOVERY**

In support of their Motion for Expedited Discovery, ECF No. 45, the Plaintiff States submit this notice of supplemental information. Last night, Defendant President Donald Trump stated to Congress:

To further combat inflation, we will not only be reducing the cost of energy, but will be ending the flagrant waste of taxpayer dollars. And to that end, I have created the brand new Department of Government Efficiency, DOGE. Perhaps you’ve heard of it. Perhaps. *Which is headed by Elon Musk*, who is in the gallery tonight.

*LIVE: Donald Trump delivers speech to Congress*, Assoc. Press (Mar. 4, 2025),

<https://www.youtube.com/watch?v=LEygBVr1neI>, at Tr. 1:26:52 (emphasis added).

This admission is in conflict with statements made in the Fisher Declaration, previously submitted by Defendants in this action. *See* ECF No. 24-1 at 1-2 (stating that Defendant Musk is merely a “Senior Advisor to the President” and “is not the U.S. DOGE Service Administrator”).

Plaintiffs submit this supplemental information as further support for their request for expedited discovery.

Dated: March 5, 2025

Respectfully submitted,

**KRISTIN K. MAYES**

Attorney General for the State of Arizona

By: /s/ Joshua D. Bendor

Joshua D. Bendor

D.D.C. Bar ID 031908

*Solicitor General*

Daniel Clayton Barr

*Chief Deputy Attorney General*

2005 North Central Avenue

Phoenix, AZ 85004

(602) 542-3333

[Joshua.Bendor@azag.gov](mailto:Joshua.Bendor@azag.gov)

[Daniel.Barr@azag.gov](mailto:Daniel.Barr@azag.gov)

*Attorneys for the State of Arizona*

**RAÚL TORREZ**

Attorney General of the State of New Mexico

Anjana Samant

D.D.C. Bar ID 4267019

*Deputy Counsel*

James Grayson

*Chief Deputy Attorney General*

Steven Perfrement\*

*Assistant Attorney General*

Malina Simard-Halm

*Assistant Attorney General*

New Mexico Department of Justice

408 Galisteo Street

Santa Fe, NM 87501

(505) 270-4332

[jgrayson@nmdoj.gov](mailto:jgrayson@nmdoj.gov)

[asamant@nmdoj.gov](mailto:asamant@nmdoj.gov)

[sperfrement@nmdoj.gov](mailto:sperfrement@nmdoj.gov)

[msimard-halm@nmdoj.gov](mailto:msimard-halm@nmdoj.gov)

*Attorneys for the State of New Mexico*

**DANA NESSEL**

Attorney General, State of Michigan

Jason Evans

*Assistant Attorney General*

Joseph Potchen

*Deputy Attorney General*

Linus Banghart-Linn\*

*Chief Legal Counsel*

Michigan Department of Attorney General

525 W. Ottawa St.

Lansing, MI 48933

(517) 335-7632

[evansj@michigan.gov](mailto:evansj@michigan.gov)

*Attorneys for the People of the State of Michigan*

**ROB BONTA**

Attorney General for the State of California

Nicholas R. Green

*Deputy Attorney General*

Thomas S. Patterson\*

*Senior Assistant Attorney General*

Mark R. Beckington\*

John D. Echeverria\*

*Supervising Deputy Attorneys General*

Maria F. Buxton\*

Michael E. Cohen\*

*Deputy Attorneys General*

California Attorney General's Office

455 Golden Gate Avenue

Suite 11000

San Francisco, CA 94102

(415) 510-4400

[nicholas.green@doj.ca.gov](mailto:nicholas.green@doj.ca.gov)

*Counsel for the State of California*

**WILLIAM TONG**

Attorney General for the State of Connecticut

Timothy Holzman

*Assistant Attorney General*

165 Capitol Ave

Hartford, CT 06106  
(860) 808-5020  
[Timothy.Holzman@ct.gov](mailto:Timothy.Holzman@ct.gov)

*Attorneys for the State of Connecticut*

**ANNE E. LOPEZ**

Attorney General for the State of Hawai'i

Kaliko'onālani D. Fernandes  
*Solicitor General*  
David D. Day  
*Special Assistant to the Attorney General*  
425 Queen Street  
Honolulu, HI 96813  
(808) 586-1360  
[kaliko.d.fernandes@hawaii.gov](mailto:kaliko.d.fernandes@hawaii.gov)

*Attorneys for the State of Hawai'i*

**ANTHONY G. BROWN**

Attorney General for the State of Maryland

Adam D. Kirschner  
*Senior Assistant Attorney General*  
200 Saint Paul Place, 20th Floor  
Baltimore, MD 21202  
(410) 576-6424  
[AKirschner@oag.state.md.us](mailto:AKirschner@oag.state.md.us)

*Attorneys for the State of Maryland*

**ANDREA JOY CAMPBELL**

Attorney General of Massachusetts

Gerard J. Cedrone  
*Deputy State Solicitor*  
Massachusetts Office of the Attorney General  
One Ashburton Place, 20th Floor  
Boston, MA 02108  
(617) 963-2282  
[gerard.cedrone@mass.gov](mailto:gerard.cedrone@mass.gov)

*Attorneys for the Commonwealth of Massachusetts*

**KEITH ELLISON**

Attorney General for the State of Minnesota

Liz Kramer\*\*

*Solicitor General*

445 Minnesota Street, Suite 600

St. Paul, MN 55101

(651) 757-1010

[liz.kramer@ag.state.mn.us](mailto:liz.kramer@ag.state.mn.us)

*Attorneys for the State of Minnesota*

**AARON D. FORD**

Attorney General for the State of Nevada

Heidi Parry Stern

D.D.C. Bar ID 8873

*Solicitor General*

Office of the Nevada Attorney General

1 State of Nevada Way, Suite 100

Las Vegas, NV 89119

[HStern@ag.nv.gov](mailto:HStern@ag.nv.gov)

*Attorneys for the State of Nevada*

**DAN RAYFIELD**

Attorney General for the State of Oregon

Brian S. Marshall

D.D.C. Bar ID 501670

*Senior Assistant Attorney General*

100 SW Market Street

Portland, OR 97201

(971) 673-1880

[brian.s.marshall@doj.oregon.gov](mailto:brian.s.marshall@doj.oregon.gov)

*Counsel for the State of Oregon*

**PETER F. NERONHA**

Attorney General for the State of Rhode Island

Jeff Kidd

*Special Assistant Attorney General*

150 South Main Street  
Providence, RI 02903  
(401) 274-4400  
[jkidd@riag.ri.gov](mailto:jkidd@riag.ri.gov)

*Attorneys for the State of Rhode Island*

**CHARITY R. CLARK**  
Attorney General for the State of Vermont

Ryan P. Kane  
*Deputy Solicitor General*  
109 State Street  
Montpelier, VT 05609  
(802) 828-2153  
[ryan.kane@vermont.gov](mailto:ryan.kane@vermont.gov)

*Attorneys for the State of Vermont*

**NICHOLAS W. BROWN**  
Attorney General for the State of Washington

Kelsey Endres  
*Assistant Attorney General*  
Emma Grunberg\*  
*Deputy Solicitor General*  
800 Fifth Avenue, Suite 2000  
Seattle, WA 98104  
(206) 464-7744  
[kelsey.endres@atg.wa.gov](mailto:kelsey.endres@atg.wa.gov)  
[emma.grunberg@atg.wa.gov](mailto:emma.grunberg@atg.wa.gov)

*Attorneys for the State of Washington*

\* *Pro Hac Vice Motion Forthcoming*

\*\* *Pro Hac Vice Motion Pending*