

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF LOUISIANA
MONROE DIVISION

STATE OF MISSOURI ex rel. ERIC S.
SCHMITT, Attorney General, *et al.*,

Plaintiffs,

v.

JOSEPH R. BIDEN, JR.,
in his official capacity as President of the
United States, *et al.*,

Defendants.

No. 3:22-cv-01213-TAD-KDM

DEFENDANTS' MOTION FOR PROTECTIVE ORDER REGARDING AUDIOVISUAL
RECORDINGS OF DEPOSITIONS AND PERSONALLY IDENTIFIABLE
INFORMATION IN DEPOSITION TRANSCRIPTS AND REQUEST FOR EXPEDITED
CONSIDERATION

For the reasons stated in the accompanying memorandum, Defendants hereby move, pursuant to Federal Rule of Civil Procedure 26(c)(1), for entry of the proposed protective order attached as Exhibit A to this motion. Counsel for Defendants met and conferred with counsel for Plaintiffs and was advised that Plaintiffs object to this motion. Moreover, and as stated in the accompanying memorandum, Plaintiffs' counsel has so far rejected a proposal to refrain from disclosing the material that is the subject of this motion while the motion is pending. Accordingly, given that the first of the authorized depositions is scheduled to take place on Thursday, November 10, 2022, Defendants respectfully request expedited consideration of this motion.

Dated: November 9, 2022

Respectfully submitted,

BRIAN M. BOYNTON
Principal Deputy Assistant Attorney General

JAMES J. GILLIGAN
Special Litigation Counsel, Federal Programs
Branch

/s/ Amanda K. Chuzi

ADAM D. KIRSCHNER (IL Bar No. 6286601)

Senior Trial Counsel

KYLA SNOW (OH Bar No. 96662)

INDRANEEL SUR (D.C. Bar No. 978017)

AMANDA K. CHUZI (D.C. Bar No. 1738545)

Trial Attorneys

U.S. Department of Justice

Civil Division, Federal Programs Branch

1100 L. Street, NW

Washington D.C. 20005

Tel.: (202) 514-4686

Fax: (202) 616-8470

Email: amanda.k.chuzi@usdoj.gov

Attorneys for Defendants