

**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.*

Case No. 3:22-cv-01213

**PLAINTIFFS' MOTION TO COMPEL SUPPLEMENTAL  
DISCLOSURES FROM DEFENDANT CYBERSECURITY AND  
INFRASTRUCTURE SECURITY AGENCY**

For the reasons stated in their Memorandum in Support filed contemporaneously herewith, Plaintiffs respectively move the Court to compel Defendant Cybersecurity and Infrastructure Security Agency ("CISA") to supplement in a timely manner its document production by producing any and all documents responsive to Plaintiffs' discovery requests from CISA custodians Chad Josiah, Rob Schaul, Alex Zaheer, John Stafford, and Pierce Lowary.

Dated: January 19, 2023

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Respectfully submitted,

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**CERTIFICATE OF SERVICE**

I hereby certify that, on January 19, 2023, I caused a true and correct copy of the foregoing to be filed by the Court's electronic filing system, to be served by operation of the Court's electronic filing system on counsel for all parties who have entered in the case.

/s/ D. John Sauer