

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

STATE OF MISSOURI, STATE OF
LOUISIANA, *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 FOR LEAVE TO AMEND COMPLAINT TO
ADD CLASS ALLEGATIONS AND FOR CLASS CERTIFICATION**

For the reasons stated in their Memorandum filed contemporaneously herewith, Plaintiffs respectively move the Court for leave to amend their Complaint to add class allegations and for class certification. Plaintiffs' proposed Third Amended Complaint is attached to this Motion. Plaintiffs have conferred with Defendants, and Defendants indicated that they oppose the relief requested in this Motion.

Dated: March 20, 2023

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Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that, on March 20, 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/ Charles F. Capps