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

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| STATE OF MISSOURI ex rel. ERIC S. SCHMITT, Attorney General, and<br><br>STATE OF LOUISIANA ex rel. JEFFREY M. LANDRY, Attorney General,<br><br>*Plaintiffs*,<br><br>v.<br><br>JOSEPH R. BIDEN, JR., in his official capacity as President of the United States, *et al.*,<br><br>*Defendants*. | Case No. 3:22-cv-01213 |

**PLAINTIFFS' MOTION FOR EXPEDITED**
**PRELIMINARY INJUNCTION-RELATED DISCOVERY**

Plaintiffs, the States of Missouri and Louisiana, by and through their Attorneys General, Eric S. Schmitt and Jeffrey M. Landry (collectively, "Plaintiffs" or "the States"), respectfully request that the Court authorize expedited preliminary-injunction-related discovery on a limited basis, to allow Plaintiffs to ascertain the identities and nature of communications of federal officials who are coordinating with social-media platforms on the suppression and censorship of online speech. For the reasons stated in the States' accompanying Memorandum in Support of Motion for Expedited Preliminary-Injunction-Related Discovery, which is incorporated by reference herein, good cause exists for the Court to grant such discovery on the expedited schedule proposed herein. For the reasons stated in that Memorandum, Plaintiffs respectfully request that this Court grant their Motion for Expedited Preliminary-Injunction-Related Discovery, and

Plaintiffs respectfully request that this Court adopt the following schedule for such expedited discovery:

(1) Within three business days of the date of the Court's ruling on this Motion, if not before, Plaintiffs shall serve interrogatories and document requests on Defendants to discover the identities of federal officials who have been and are communicating with social-media platforms about so-called disinformation, misinformation, malinformation, and any censorship or suppression of speech on social media, and to discover the nature and content of those communications. In the same time, Plaintiffs may serve third-party subpoenas on a limited number of major social-media platforms seeking similar information about the identity of federal officials who communicate with them, and the nature and content of those communications.

(2) Within fourteen days of service of Plaintiffs' discovery requests, those receiving them shall provide objections and responses, if any, as well as responsive documents to Plaintiffs. Among other grounds, Defendants will have the opportunity to object on the ground that they believe any particular discovery request is overbroad or beyond the scope of the expedited discovery sought in Plaintiffs' Motion.

(3) Within ten days following receipt of the objections and responses and responsive documents, the parties shall meet and confer in good faith about any discovery disputes. At the conclusion of those ten days, the parties shall submit a joint statement to the Court in writing detailing the nature of all remaining disputes, if any.

(4) Also within ten days of receiving objections, responses, and documents, Plaintiffs shall notify Defendants whether, based on the discovery responses received, they seek any depositions relating to this discovery under Rule 30(a)(2) of the Federal Rules of Civil Procedure. The parties shall meet and confer regarding any such deposition requests within the same ten-day period. If

the parties do not agree on depositions, at the conclusion of those ten days, the parties shall submit separate statements to the Court stating their positions on whether and why they believe any such deposition(s) should occur.

(5) After receiving those written submissions, the Court shall determine whether and to what extent additional document(s) should be produced, and whether and to what extent Rule 30(a)(2) deposition(s) will be allowed.

Dated: June 17, 2022

Respectfully submitted,

**ERIC S. SCHMITT**
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**CERTIFICATE OF SERVICE**

I hereby certify that, on June 17, 2022, 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*