

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

STATE OF LOUISIANA, by and through its
Attorney General, Jeff Landry, *et al.*,

Plaintiffs,

v.

XAVIER BECERRA, in his official capacity
as Secretary of Health and Human Services, *et
al.*,

Defendants.

Civil Action No. 3:21-CV-4370-TAD-KDM

**DEFENDANTS' MOTION TO EXTEND
RECORD COMPLETION DEADLINE**

Defendants, various federal officials and agencies, respectfully request an extension of time to comply with this Court's order regarding completion of the administrative record. *See* Local Rules 7.4.1 and 7.9. Defendants request that the current deadline be extended by thirty days, until July 15, 2022.

On May 16, 2022, the Court ordered Defendants "to complete the administrative record by providing evidence of meetings, phone calls, communications, correspondence, documents, input, approvals, or any other involvement of the White House." Order at 12, ECF No. 76. The Court gave Defendants until June 15, 2022, to "fil[e] the required information." *Id.* While Defendants have been working diligently to comply with the Court's Order, they need additional time to search for and process any responsive records. The searches are currently ongoing and will likely take several weeks to complete. Defendants must then review any responsive records on a document-by-document basis to determine whether any responsive records contain privileged material and, if they do, prepare a

privilege log. *Id.* at 8 (directing completion of the administrative record to include White House communications “if directly or indirectly considered by the agency decisionmakers, unless privileged”). This process could also take another several weeks.

For these reasons, Defendants request that the Court extend the deadline to comply with the Court’s order by thirty days, until July 15, 2022. Pursuant to LR 7.9, Defendants certify that they have conferred with Plaintiffs’ counsel regarding the relief sought in this motion. Plaintiffs have indicated that they would not oppose a fourteen-day extension, but oppose a longer extension.

Dated: June 3, 2022

Respectfully submitted,

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Principal Deputy Assistant Attorney General

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Attorneys for Defendants

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FOR THE WESTERN DISTRICT OF LOUISIANA
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_____)	
STATE OF LOUISIANA, <i>et al.</i> ,)	
)	
Plaintiffs,)	
)	
v.)	Civil Action No. 3:21-CV-04370-TAD-KDM
)	
XAVIER BECERRA, in his official capacity)	
as Secretary of the United States Department)	
of Health and Human Services, <i>et al.</i> ,)	
)	
Defendants.)	
_____)	

[DRAFT] PROPOSED ORDER

On this day came to be considered Defendants’ Motion to Extend Record Completion Deadline. After considering the motion and the pleadings of the parties filed herein, and finding that good cause has been shown for the relief requested:

It is hereby **ORDERED** that Defendants’ Motion to Extend Record Completion Deadline is **GRANTED**. Defendants may complete the administrative record, along with any privilege log, no later than July 15, 2022. The Court’s Order [Doc. No. 76] is hereby amended to reflect Defendants’ new deadline.

IT IS SO ORDERED.

June ____, 2022

THE HONORABLE TERRY A. DOUGHTY
UNITED STATES DISTRICT JUDGE