

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

THE STATE OF LOUISIANA,  
By and through its Attorney General,  
JEFF LANDRY, et al.,

PLAINTIFFS,

v.

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

DEFENDANTS.

Civ. No. 2:21-cv-00778-TAD-KK

**Statement Regarding Supplemental Administrative Record**

Plaintiff States submit this Statement in response to Defendants' submissions of supplemental administrative records and privilege logs. Docs. 186, 192. Plaintiff States' position is that the administrative record remains incomplete and that Defendants have inappropriately invoked privilege to withhold key parts of the record. Indeed, Defendants admit, via the privilege log, that White House involvement exists regarding this matter, but refuse to disclose any specifics or documents. *See* Doc. 192-5 at 5-7. At this time, however, Plaintiff States withdraw their extra-record discovery motion, ECF No. 174, without prejudice and intend to move for summary judgment within thirty days in accordance with this Court's order adopting the Rule 26(f) report, ECF Nos. 151 at 2, 153, and extra record discovery order, ECF No. 180 at 2 n.3. Plaintiff States take this step to ensure the expeditious resolution of this case and the certainty afforded by a final judgment—not because they believe the administrative record is complete or that Defendants have appropriately invoked privilege.

Accordingly, Plaintiff States **withdraw** their extra-record discovery motion **without prejudice**.

Respectfully submitted,

Dated: March 7, 2022

/s/Elizabeth B. Murrill

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