

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

JOHN AND JANE DOES 1-9, et al.,

Plaintiffs,

v.

DEPARTMENT OF JUSTICE,

Defendant.

Civil Action No. 25-0325 (JMC)

FEDERAL BUREAU OF INVESTIGATION
AGENTS ASSOCIATION, et al.,

Plaintiffs,

v.

DEPARTMENT OF JUSTICE, et al.,

Defendants.

Civil Action No. 25-0328 (JMC)

PLAINTIFFS' REVISED MOTION FOR EXPEDITED DISCOVERY

The above-captioned consolidated Plaintiffs hereby file this motion and accompanying memorandum for expedited discovery in the above-captioned matter, which is a revision of the motion filed at ECF No. 20, denied without prejudice to refile. Plaintiffs respectfully request Defendants provide discovery within a timeframe that accommodates the preliminary hearing currently scheduled for March 27, 2025. As explained in the supporting memorandum of law attached hereto, the requested discovery materials have been narrowed in response to the Court's February 28, 2025 Minute Order, are limited in scope, are for good cause, and should be easily retrievable by the Government. Plaintiffs' revised discovery requests are attached hereto as Exhibit A. Plaintiffs' per-item justification for those requests is attached hereto as Exhibit B.

In accordance with Local Civil Rule 7(m), at 9:00 a.m. on March 5, 2025, the parties met via videoconference to conduct a meet-and-confer regarding the Plaintiffs' revised requests. Following that meeting, Plaintiffs further reduced their revised requests and resubmitted them to the Government for consideration on March 10, 2025. The Government opposed the revised disclosures and submitted the following statement: "Defendants oppose Plaintiffs' revised request for expedited discovery and intend to file an opposition setting forth the reasons for its opposition on or before March 18, 2025. In conferring with Plaintiffs on this motion, Defendants understand that Plaintiffs do not object to this response date." Plaintiffs do not object to this response date.

WHEREFORE, Plaintiffs respectfully request that the Court enter an order allowing for such limited expedited discovery, as set forth in the attached Proposed Order.

March 10, 2025

Respectfully submitted,

LAW OFFICE OF MARK S. ZAID, P.C.

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