

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS

NAVY SEALs 1-3, et al.,

Plaintiffs,

v.

LLOYD J. AUSTIN, III in his official capacity as
United States Secretary of Defense, et al.,

Defendants.

Case No. 4:21-cv-01236-O

DEFENDANTS' FIRST MOTION TO COMPEL

Defendants respectfully request that this Court order Plaintiffs to respond fully and completely to Defendants' First Set of Interrogatories and First Set of Requests for Productions in accordance with the proposed order, and for the reasons set forth in the accompanying memorandum and supporting materials.

Dated: August 18, 2022

Respectfully submitted,

BRIAN M. BOYNTON
Principal Deputy Assistant Attorney General

ALEXANDER K. HAAS
Director, Federal Programs Branch

ANTHONY J. COPPOLINO
Deputy Director

/s/ Amy E. Powell
ANDREW E. CARMICHAEL (VA Bar. No. 76578)
AMY E. POWELL
Senior Trial Counsel
STUART J. ROBINSON
Senior Counsel
ZACHARY A. AVALLONE
LIAM C. HOLLAND
Trial Attorney

United States Department of Justice
Civil Division, Federal Programs Branch
1100 L Street, N.W.
Washington, DC 20005
Tel: (202) 514-3346
Fax: (202) 616-8470
Email: Andrew.e.carmichael@usdoj.gov

Counsel for Defendants

CERTIFICATE OF CONFERENCE

Counsel for Defendants conferred with Plaintiffs' counsel regarding this motion through email and telephone on multiple occasions between July 20, and August 16, 2022. Plaintiffs' counsel indicated that they oppose the relief requested in Defendants' motion. *See* DEX13 (App.689-90)

/s/ Amy E. Powell

Amy Elizabeth Powell
Counsel for Defendants