

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI**

PAUL BERRY III,	)	
	)	
Plaintiff,	)	
	)	Case No. 4:22-cv-00465-JAR
v.	)	
	)	
JOHN R. ASHCROFT, et al.,	)	
	)	
Defendants.	)	

**DEFENDANTS’ RESPONSE TO MOTIONS TO  
INTERVENE BY PARELES AND THOMAS PLAINTIFFS**

Per the Court’s Order of May 9, 2022, shortening Defendants’ time to respond to a motion for intervention, Doc. 24, Defendants file this response to the *Pereles* plaintiffs<sup>1</sup> motion to intervene filed on Friday, May 6, 2022. Doc. 19. Additionally, the *Thomas* plaintiffs<sup>2</sup> filed a substantively identical motion to intervene on May 10, 2022. Doc. 26.

Reserving the right to assert all defenses and privileges to each complaint, and in the interest of expediency, Defendants do not oppose the motions to intervene by the *Pereles* and *Thomas* plaintiffs.

Dated: May 11, 2022

Respectfully submitted,

**ERIC S. SCHMITT  
MISSOURI ATTORNEY GENERAL**

/s/ Jeff P. Johson  
Jeff P. Johnson, DC 102291  
Deputy Solicitor General  
D. John Sauer, MO 58721  
Solicitor General  
Supreme Court Building

<sup>1</sup> *Pereles v. Ashcroft*, No. 22AC-CC00114 (Cir. Ct. Cole Cnty. filed Mar 11, 2022).

<sup>2</sup> *Thomas v. Ashcroft*, No. 22AC-CC00222 (Cir. Ct. Cole Cnty. filed Mar 31, 2022)

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**CERTIFICATE OF SERVICE**

I hereby certify that on May 11, 2022, the foregoing was filed electronically through the Court's CM/ECF system, to be served electronically upon all parties to the case.

*/s/ Jeff P. Johnson*