

**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* plaintiffs¹ motion to intervene filed on Friday, May 6, 2022. Doc. 19. Additionally, the *Thomas* plaintiffs² 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

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

² *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

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