

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF WISCONSIN  
GREEN BAY DIVISION**

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VILLAGE OF HOBART, WISCONSIN,

Plaintiff,

v.

Case No. 23-CV-01511–WCG

UNITED STATES DEPARTMENT  
OF THE INTERIOR, *et al.*

Defendants.

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**PLAINTIFF’S MOTION TO SUPPLEMENT AND COMPLETE THE  
ADMINISTRATIVE RECORD AND ENGAGE IN DISCOVERY**

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Plaintiff Village of Hobart, Wisconsin (the “Village”), by and through its attorneys, von Briesen & Roper, s.c., hereby move the Court, pursuant to the Court’s August 15, 2024 Scheduling Order (Dkt. 38) for an order compelling the supplementation and completion of the Administrative Record in this matter, which was re-lodged with the Court on July 30, 2024 (Dkt.32), and for an order permitting the Village to engage in discovery in this matter. Plaintiff seeks the following relief:

1. An order requiring Defendants to submit to the Village, and to the Court, the complete Administrative Record as it was provided to the IBIA, including documents that Defendants (a) failed to identify in the index lodged with the Court, and (b) intentionally did not include in the Administrative Record that was lodged with the Court on July 30, 2024.
2. In the alternative, an order requiring Defendants to provide the Village with a privilege

log of any withheld documents that the Court determines the privilege applies to and to simultaneously submit those documents to the Court for an *in camera* review.

3. An order permitting the Village to seek discovery in this matter with respect to the constitutional and bias claims advanced by the Village.

The grounds for this Motion are set forth in the Village's Brief in Support of its Motion to Supplement and Complete the Administrative Record and Engage in Discovery, which is being contemporaneously filed herewith.

Dated: August 30, 2024.

VON BRIESEN & ROPER, S.C.

*s/ Frank W. Kowalkowski*

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