

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

STYRENE INFORMATION AND)
RESEARCH CENTER, INC., *et al.*,)
)
Plaintiffs,)
)
v.)
)
KATHLEEN SEBELIUS, *et al.*,)
)
Defendants.)
)
)

Civil Action No. 1:11-cv-01079-RBW

**PLAINTIFFS’ MOTION TO COMPLETE THE ADMINISTRATIVE RECORD AND
TO COMPEL RESPONSES TO PLAINTIFFS’
FIRST REQUEST FOR PRODUCTION OF DOCUMENTS**

Pursuant to Federal Rule of Civil Procedure 37, Plaintiffs Styrene Information and Research Center, Inc., and Dart Container Corporation, by their undersigned counsel, move the Court to order Defendants to complete the Administrative Record (“Record”) before the Court and for leave to take limited discovery as necessary. The Record, as filed, demonstrates that it is missing important documents related to Defendants’ decision to list styrene in the 12th Report on Carcinogens as a substance reasonably anticipated to cause cancer in humans.

Plaintiffs also move the Court for an order compelling Defendants to respond to Plaintiffs’ First Request for Production of Documents with which Defendants have categorically refused to comply. The documents sought by Plaintiffs also should have been included in the Record.

The bases for Plaintiffs’ motion are set out more fully in the accompanying Memorandum of Points and Authorities.

Counsel for Plaintiffs certify that they have in good faith conferred and attempted to resolve the issues with Defendants without court action but have been unable to do so.

Dated: September 26, 2011

Respectfully submitted,

/s/ Douglas J. Behr

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CERTIFICATE OF SERVICE

I hereby certify that on September 26, 2011, a copy of the foregoing was filed with the Court's CM/ECF software and served via the same on Defendants' counsel of record.

/s/ Robert A. Sheffield
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