

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA
MONROE DIVISION**

JILL HINES, ET AL.,

Plaintiffs,

v.

ALEX STAMOS, ET AL.,

Defendants.

Case No. 3:23-cv-571

Chief Judge Terry A. Doughty

Magistrate Judge Kayla D. McClusky

**DEFENDANTS' JOINT MOTION TO COMPEL INDIVIDUAL ARBITRATION,
DISMISS PLAINTIFFS' CLASS CLAIMS, AND STAY ALL PROCEEDINGS, OR
ALTERNATIVELY TO TRANSFER VENUE UNDER 28 U.S.C. § 1404**

For the reasons stated in the accompanying memorandum, Defendants Alex Stamos, Renée DiResta, the Board of Trustees of the Leland Stanford Junior University, the Leland Stanford Junior University, the Stanford Internet Observatory (SIO), Kate Starbird, Graphika, Camille François, the Atlantic Council, the Atlantic Counsel's Digital Forensic Research Lab (DFRLab), and Graham Brookie (together, "Defendants") jointly move to compel individual arbitration of all claims in this case, to dismiss the class claims, and to stay all proceedings pending arbitration. If the Court concludes that any of Plaintiffs' claims may proceed in court, Defendants move to transfer venue to the Northern District of California under 28 U.S.C. § 1404.

Defendants are also moving to dismiss, but the Court should decide the instant motion to compel arbitration or alternatively to transfer venue before addressing any merits-based ground for dismissal in the motion to dismiss, *i.e.*, before addressing whether the complaint states a claim upon which relief may be granted under Rule 12(b)(6) of the Federal Rules of Civil Procedure.

August 14, 2023

/s/ Camala E. Capodice

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 14th day of August, 2023, I electronically filed the foregoing with the Clerk of Court by using the CM/ECF system, which will provide notice of electronic filing to the attorneys for all parties.

/s/ James Brown

James Brown