

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION**

X CORP.,

Plaintiff,

v.

**MEDIA MATTERS FOR AMERICA,
et al.,**

Defendants.

Civil Action No. 4:23-cv-01175-O

**DEFENDANTS' MOTION TO COMPEL
DISCOVERY RESPONSES**

Defendants Media Matters for America, Eric Hananoki, and Angelo Carusone (“Media Matters”) bring this motion to compel Plaintiff X Corp. to amend its discovery responses and produce documents. For the reasons stated in the accompanying brief in support, Media Matters requests that the Court overrule X’s objections to Media Matters’s discovery requests, including:

- Objections to discovery requests relating to Elon Musk, specifically:
 - Interrogatory No. 6.
 - Requests for Admission Nos. 82–83;
 - Request for Production No. 26.
- Objections to discovery requests about content moderation on X’s platform, specifically:
 - Requests for Production Nos. 13, 25, 28.
- Objections to discovery requests to authenticate posts on X’s platform, specifically:
 - Requests for Admission Nos. 5, 9(A)–73(B).

- Objections to discovery requests about advertisers that discontinued their relationship with X, specifically:
 - Interrogatory No. 8;
 - Requests for Production Nos. 7, 9, 17, 33.

Media Matters respectfully requests this Court to order amended written responses due no later than seven (7) days after its order, and supplemental document productions due within ten (10) days. Additionally, Media Matters requests an award of attorneys' fees related to X's refusal to appropriately answer Request for Admission No. 5.

Dated: October 18, 2024.

Respectfully submitted,
/s/ Andrew LeGrand

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Counsel for Defendants Media Matters for America, Angelo Carusone, and Eric Hananoki

CERTIFICATE OF CONFERENCE

I certify that the parties have conferred on multiple occasions, including via letter correspondence on August 16, September 6, September 25, September 27, October 9, October 14, and October 18, 2024, regarding the issues raised in this motion to compel. Notwithstanding those conferrals, there remain intractable grounds of disagreement necessitating this motion.

/s/ Andrew LeGrand
Andrew LeGrand

CERTIFICATE OF SERVICE

On October 18, 2024, I electronically submitted the foregoing document with the clerk of court for the U.S. District Court, Northern District of Texas, using the electronic case filing system of the court. I hereby certify that I have served all parties electronically or by another manner authorized by Federal Rule of Civil Procedure 5(b)(2).

/s/ Andrew LeGrand
Andrew LeGrand