

**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**

**MOTION TO COMPEL CORRECTED CERTIFICATE OF INTERESTED PERSONS**

For the reasons stated in the accompanying memorandum in support, Defendants move the Court to compel Plaintiff X Corp. to file a corrected Rule 3.1(c) certificate of interested persons listing Tesla, Inc., its shareholders, and any other persons or entities having a financial interest in this matter that X Corp. has not previously disclosed.

Dated: June 17, 2024.

Respectfully submitted,  
/s/ Andrew LeGrand

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**CERTIFICATE OF CONFERRAL**

Defendants' counsel requested that X amend its deficient certificate during a telephonic conference on June 13, 2024. Counsel for X indicated that X would evaluate the issue. Counsel for X then indicated by email on June 17 that X opposes this motion, and that while it may amend its certificate to provide slightly more detail, it would not list Tesla as an interested party.

/s/ Andrew LeGrand

Andrew LeGrand

**CERTIFICATE OF SERVICE**

On June 17, 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