

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

**X CORP.**, a Nevada corporation,

Plaintiff,

vs.

**MEDIA MATTERS FOR AMERICA**, a  
Washington, D.C. non-profit corporation,  
**ERIC HANANOKI**, and **ANGELO  
CARUSONE**,

Defendants.

**Case No. 4:23-cv-01175-O**

**MOTION TO COMPEL PRODUCTION OF DONOR-RELATED DOCUMENTS**

Plaintiff X Corp. (“X”) brings this motion to compel the production of donor-related documents against Defendants Media Matters for America, Eric Hanonoki, and Angelo Carusone. For the reasons stated in the accompanying brief in support, X requests that the Court issue an order overruling Defendants’ objections to X’s Requests for Production Nos. 17, 18, 21 and 35, which seek documents and communications concerning Defendants’ donors, and requiring Defendants to promptly provide responsive documents to those requests for production.

Dated: August 30, 2024

Respectfully submitted,

/s/ Christopher D. Hilton

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**CERTIFICATE OF CONFERENCE**

I certify that the parties have conferred on multiple occasions, most recently on July 29, 2024, and August 2, 2024, regarding the issues raised in this motion to compel. Notwithstanding those conferrals, there remain intractable grounds of disagreement necessitating this motion. Defendants oppose this motion but agree with Plaintiff that this dispute is ripe for judicial intervention.

/s/ Christopher D. Hilton  
Christopher D. Hilton

**CERTIFICATE OF SERVICE**

I hereby certify that on August 30, 2024, a copy of this document was served on all counsel of record through the Court's CM/ECF system in accordance with the Federal Rules of Civil Procedure.

/s/ Alexander M. Dvorscak  
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