

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

**EXPEDITED RULING BY OCT. 2, 2024
AT 12:00 P.M. RESPECTFULLY
REQUESTED**

**DEFENDANTS' EMERGENCY MOTION TO STAY ORDER COMPELLING
PRODUCTION OF DONOR-RELATED DOCUMENTS PENDING APPEAL**

Pursuant to Federal Rule of Appellate Procedure 8(a)(1)(A), Defendants Media Matters for America, Eric Hananoki, and Angelo Carusone move the Court to stay its Order granting Plaintiffs' Motion to Compel Production of Donor Related Documents, ECF No. 98 ("Order"), pending the outcome of Defendants' appeal of that Order.

For the reasons stated in the accompanying Brief in Support, Defendants request that the Court enter the accompanying Proposed Order. Alternatively, Defendants respectfully request that the Court grant a two week extension of its production deadline—from October 7 to October 21—to permit the Fifth Circuit to evaluate Defendants' forthcoming stay motion in an orderly fashion.

Given the timing exigencies—and substantial First Amendment issues at stake—Defendants further respectfully request that the Court rule on the instant motion (including any denial) by **Wednesday, October 2, 2024 at 12:00 p.m.** to permit time for a stay request to the Fifth Circuit ahead of the Court's October 7 deadline.

Dated: October 1, 2024

Respectfully submitted,
/s/ Andrew LeGrand

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

CERTIFICATE OF CONFERRAL

On October 1, 2024, counsel for Defendants conferred with counsel for X Corp. to obtain their position on this motion. Having received no response to date, Defendants assume that X Corp. opposes the motion.

/s/ Andrew LeGrand
Andrew LeGrand

CERTIFICATE OF SERVICE

On October 1, 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