

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA
No. 1:23-CV-878**

DEMOCRACY NORTH CAROLINA; *et al.*,

Plaintiffs,

vs.

ALAN HIRSCH, in his official capacity as
CHAIR OF THE STATE BOARD OF
ELECTIONS; *et al.*,

Defendants.

MOTION TO STAY

NOW COME Intervenor-Defendants Philip E. Berger, in his official capacity as President *Pro Tempore* of the North Carolina Senate, and Timothy K. Moore, in his official capacity as Speaker of the North Carolina House of Representatives (collectively, the “Legislative Defendants”), by and through undersigned counsel, and pursuant to this Court’s inherent authority to “control the disposition of the causes on its docket[.]” *Maryland v. Universal Elections, Inc.*, 729 F.3d 370, 375 (4th Cir. 2013), hereby move this Court for an order staying this case. In light of the impending discovery deadlines and to avoid incurring potentially unnecessary expense, Legislative Defendants also respectfully request expedited briefing in this matter via a separate Motion to Expedite. The Motion to Stay should be granted for all the reasons stated in the Memorandum in Support of the Motion to Stay being filed contemporaneously with this Motion.

Respectfully submitted, this the 30th day of April, 2024.

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/s/ Phillip J. Strach

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CERTIFICATE OF SERVICE

I, Phillip J. Strach, hereby certify that I have this day electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will provide electronic notification to counsel of record.

This the 30th day of April, 2024.

**NELSON MULLINS RILEY &
SCARBOROUGH LLP**

/s/ Phillip J. Strach

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