

**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.

**NELSON MULLINS RILEY &  
SCARBOROUGH LLP**

/s/ Phillip J. Strach

Phillip J. Strach

N.C. State Bar No. 29456

Alyssa M. Riggins

N.C. State Bar No. 52366

Cassie A. Holt

N.C. State Bar No. 56505

Alexandra M. Bradley

N.C. State. Bar No. 54872

301 Hillsborough Street, Suite 1400

Raleigh, NC 27603

Telephone: (919) 329-3800

Facsimile: (919) 329-3779

phil.strach@nelsonmullins.com

alyssa.riggins@nelsonmullins.com

cassie.holt@nelsonmullins.com

alex.bradley@nelsonmullins.com

*Counsel for Legislative Defendants*

**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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Phillip J. Strach  
N.C. State Bar No. 29456

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