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6 *Attorneys for Defendants Elon Musk, Tesla, Inc.,*
the Elon Musk Revocable Trust dated July 22, 2003,
7 *Excession, LLC, Jared Birchall, Singer Cashman*
LLP, Allison Huebert, Adam S. Cashman, Adam G.
8 *Mehes, and Alex Spiro*

9 **UNITED STATES DISTRICT COURT**
10 **NORTHERN DISTRICT OF CALIFORNIA**
11 **SAN FRANCISCO DIVISION**

12 AARON GREENSPAN, an individual,

13 Plaintiff,

14 v.

15 ELON MUSK, an individual, TESLA, INC., a
Delaware corporation, THE ELON MUSK
16 REVOCABLE TRUST DATED JULY 22, 2003,
a trust, X CORP., a Nevada corporation formerly
17 known as TWITTER, INC., EXCESSION, LLC,
a Texas Limited Liability Company, JARED
18 BIRCHALL, an individual, MORGAN
STANLEY & COMPANY, LLC, a Delaware
19 Limited Liability Company, OMAR QAZI, an
individual, SMICK ENTERPRISES, INC., a
20 Delaware corporation, SINGER CASHMAN,
LLP, a California partnership, ADAM S.
21 CASHMAN, an individual, ALLISON
HUEBERT, an individual, ADAM G. MEHES,
22 an individual, and ALEX SPIRO, an individual,
23 and DOES 1-10, inclusive.

24 Defendants.

Case No. 3:24-cv-04647-MMC

**DEFENDANT ELON MUSK'S
OBJECTIONS AND RESPONSES TO
PLAINTIFF'S FIRST SET OF
REQUESTS FOR PRODUCTION OF
DOCUMENTS AND THINGS**

Judge: The Hon. Maxine M. Chesney
State Action Filed: June 12, 2024
Removed: July 31, 2024

**[Removed from Superior Court of
California, County of San Francisco,
Case No. CGC-24-615352]**

1 Pursuant to Rules 26 and 34 of the Federal Rules of Civil Procedure, Defendant Elon Musk
2 hereby responds to Plaintiff's First Set of Requests for Production of Documents and Things
3 ("Requests") as follows:

4 **PRELIMINARY STATEMENT**

5 Defendant Musk objects to the Requests as premature because he and all other Defendants
6 who have appeared in this action have moved to stay discovery pending resolution of their pending
7 motions to dismiss or strike. ECF No. 101 (Motion to Stay). Defendants have moved to dismiss
8 and strike on multiple grounds, including that Plaintiff's claims (a) are barred by *res judicata* and
9 issue preclusion in light of the prior dismissal of his federal claims based on the same core
10 allegations and theories as in the instant action; (b) attack protected petitioning activity and speech;
11 and/or (c) are false, immaterial, or relate to alleged acts for which Plaintiff—whose Tesla put options
12 expired in 2020—cannot possibly claim timely reliance or injury. ECF Nos. 75, 77, 82 (Motions to
13 Dismiss or Strike). Defendants' motions are set for hearing on January 17, 2025. Because the
14 motions are at least potentially dispositive of the entire case and can be decided without any
15 discovery, the case should be stayed pending a ruling. *See Reveal Chat Holdco, LLC v. Facebook,*
16 *Inc.*, 2020 WL 2843369, at *4 (N.D. Cal. Apr. 10, 2020).

17 Accordingly, these objections and responses are made solely for the purpose of preserving
18 Defendant's objections. Without in any way obligating himself to do so, Defendant reserves the
19 right: (a) to make subsequent revision, supplementation, or amendment to these objections and
20 responses based on any rulings, information, evidence, documents, facts, and/or things that hereafter
21 may be issued or discovered, or the relevance of which may hereafter be discovered; and (b) to
22 produce, introduce, or rely upon additional or subsequently acquired or discovered evidence and
23 information at trial or in any pre-trial proceedings held herein. Defendant incorporates this
24 Preliminary Statement into each response as if fully set forth therein.

25 By these responses, Defendant does not intend to waive, and does not waive, in whole or in
26 part, any objection to admitting these responses or any documents produced into evidence. Rather,
27 Defendant intends to preserve, and does preserve, all such objections, including, without limitation,
28 objections based on relevance, foundation, authenticity, or privilege.

1 **GENERAL OBJECTIONS**

2 1. Defendant objects to the Requests as premature for the reasons explained in
3 Defendants' pending Motion to Stay. *See* ECF No. 101.

4 2. Defendant objects to the Requests on the grounds and to the extent they seek
5 information, documents, or materials that are confidential and/or that Defendant is required by law
6 or contract to maintain in confidence, including, but not limited to, information, documents, or
7 materials subject to nondisclosure or confidentiality agreements between Defendant and one or more
8 third parties. There is a serious risk that Plaintiff will use any information he obtains through the
9 Requests for an improper purpose. Plaintiff has repeatedly sought notoriety and profit by publishing
10 information about Musk and others to the internet. Plaintiff also attempts to curry favor and
11 sympathy for his crusade against Musk on social media. Plaintiff's Reddit account (username
12 "u/thinkcomp") reveals his pattern of meticulously posting docket entries from cases against Musk
13 and rejecting criticism of his faulty legal theories as condescension from the "corrupt" "guild" of
14 lawyers. Finally, Plaintiff operates a website called PlainSite, <https://www.plainsite.org>, on which
15 he posts documents and data, including documents that appear to have been obtained through
16 litigation, such as deposition transcripts designated "CONFIDENTIAL."

17 3. Defendant objects to the definitions of "YOU," "YOUR," "ANYONE ACTING ON
18 YOUR BEHALF," and "TESLA" to the extent and on the grounds that they impose obligations that
19 are beyond what is required under applicable law; are overbroad, unduly burdensome, and not
20 proportional to the needs of this case; and seek information that is irrelevant to Plaintiff's claims
21 (insofar as they can be discerned) and Defendant's potential defenses. The Requests purport to
22 impose production obligations on Defendant regarding documents not within Defendant's custody
23 or control and/or encompass persons and entities with no bearing upon this case, including but not
24 limited to potential subsidiaries of Tesla, Inc.

25 4. Defendant objects to the definitions and instructions relating to the format and
26 content of the production, including, but not limited to, the definitions of "DOCUMENTS" and
27 "COMMUNICATION," along with the ESI instructions reflected in Appendix 1. The definitions
28 and instructions are vague, ambiguous, overbroad, unduly burdensome, and encompass information

1 not proportional to the needs of this case. In the event discovery proceeds in this matter, Defendant
2 is willing to discuss a reasonable ESI protocol for this action.

3 5. Defendant objects to the definition of “SIGNAL” as vague and overbroad, including
4 because it purports to encompass “any other platform.”

5 6. Defendant objects to the definition of “SHORT SELLERS” as overbroad, including
6 because it purports to encompass the entire class of persons Musk believes to have sold the common
7 stock of TESLA short, regardless of the time period or the relationship, if any, to the claims in this
8 action.

9 7. Defendant objects to the instructions regarding the logging of documents that are
10 withheld on grounds of privilege, including, but not limited to, the attorney-client privilege and
11 work product doctrine. The instructions purport to impose obligations that are beyond what is
12 required under applicable law; are overbroad and unduly burdensome; and seek information that is
13 irrelevant to Plaintiff’s claims (insofar as they can be discerned) and Defendant’s potential defenses.

14 8. Defendant objects to the instructions about creating logs for documents that have
15 been withheld from production for reasons other than privilege; that have been “destroyed or
16 discarded”; or which are otherwise not part of the requested production. Defendant further objects
17 to these instructions on the grounds that they purport to impose obligations on Defendant that exceed
18 what is required under applicable law and are overbroad and unduly burdensome.

19 9. Defendant objects to the Requests on the grounds that the proposed timeframe, which
20 encompasses the nearly eight-year period from January 1, 2017, to the present, is overbroad, unduly
21 burdensome, and seeks information that is neither relevant to any party’s claims or defenses nor
22 proportional to the needs of the case. Defendant further objects to the requested date and time of
23 the production. In the event discovery moves forward in this action, Defendant will produce any
24 agreed-upon or ordered documents, if any, at a reasonable time and place or as ordered by the Court.

25 10. Defendant objects to the Requests on the grounds and to the extent they seek
26 disclosure of documents or information protected by the attorney-client privilege, the work product
27 doctrine, the joint defense/common interest privilege, or any other claim of privilege or protection
28 (“Privileged Information”). Defendant will not disclose such documents or information in response

1 to the Requests, and any undertaking by Defendant to respond to the Requests should be understood
2 to exclude Privileged Information.

3 11. Defendant objects to the Requests on the grounds and to the extent they seek
4 inspection of documents or materials that are not “relevant to any party’s claims or defenses and
5 proportional to the needs of the case, considering the importance of the issues at stake in the action,
6 the amount in controversy, the parties’ relative access to relevant information, the parties’ resources,
7 the importance of the discovery in resolving the issues, and whether the burden or expense of the
8 proposed discovery outweighs its likely benefit.” *See* Fed. R. Civ. P. 26(b)(1).

9 12. Defendant objects to the Requests on the grounds and to the extent they purport to
10 require disclosure of information that does not exist or is not in Defendants’ possession, custody, or
11 control, or information that is in the public domain.

12 13. Defendant objects to the Requests on the grounds and to the extent they call for legal
13 conclusions, expert opinion, and/or require the subjective judgment of Defendant’s counsel in
14 violation of the work product doctrine.

15 14. Defendant objects to the Requests on the grounds and to the extent they seek to
16 impose burdens on Defendant that are inconsistent with or not otherwise authorized by the Federal
17 Rules of Civil Procedure.

18 15. Defendant objects to the Requests on the grounds and to the extent they use terms or
19 phrases that are vague, ambiguous, overbroad, unduly burdensome, and/or undefined. Defendant
20 further objects to the instructions regarding the identification of “ambiguous” language in the
21 Requests. Defendant responds to the Requests as Defendant interprets and understands them in the
22 context of the parties’ claims and defenses and, in a manner consistent with Federal Rule of Civil
23 Procedure 26(b)(1)’s definition of the proper scope of discovery. If Plaintiff subsequently asserts
24 an interpretation of any Request that differs from Defendant’s understanding, Defendant reserves
25 the right to supplement the objections and/or responses herein. Defendant’s responses shall in no
26 way constitute an admission or acknowledgement of Plaintiff’s characterizations of any allegations
27 set forth in the Requests.

28

1 16. Defendant objects to the Requests on the grounds and to the extent they seek
2 information in a format or at a level of detail other than that which is ordinarily kept and maintained
3 by Defendant in his regular course of business.

4 17. Defendant objects to the Requests on the grounds that copies of them do not appear
5 to have been served on all Defendants in this action, in violation of Rule 5 of the Federal Rules of
6 Civil Procedure.

7 **OBJECTIONS AND RESPONSES TO REQUESTS FOR PRODUCTION**

8
9 **REQUEST FOR PRODUCTION NO. 1:**

10 All DOCUMENTS that refer to Aaron Greenspan.

11 **RESPONSE TO REQUEST FOR PRODUCTION NO. 1:**

12 Defendant incorporates the foregoing Preliminary Statement and General Objections by
13 reference as though fully set forth herein. Defendant specifically objects to this Request as
14 premature for the reasons explained in Defendant's motion to stay discovery pending resolution of
15 Defendants' motions to dismiss or strike. Defendant also objects to this Request on the grounds that
16 it is overbroad, irrelevant, and not proportional to the needs of this Action, especially to the extent
17 it requests "[a]ll DOCUMENTS that refer to Aaron Greenspan" without any connection to the
18 allegations in this Action or timeframe. Defendant further objects to this Request to the extent it
19 seeks information that is confidential or subject to any protective order, privacy interest, contractual
20 obligation, or other confidentiality obligation owed to any third party. Defendant further objects to
21 this Request on the grounds and to the extent that it seeks documents that are protected from
22 disclosure by the attorney-client privilege, the work product doctrine, or any other applicable
23 privilege. Such documents will not be produced.

24
25 **REQUEST FOR PRODUCTION NO. 2:**

26 All DOCUMENTS that refer to PlainSite.
27
28

1 **RESPONSE TO REQUEST FOR PRODUCTION NO. 2:**

2 Defendant incorporates the foregoing Preliminary Statement and General Objections by
3 reference as though fully set forth herein. Defendant specifically objects to this Request as
4 premature for the reasons explained in Defendant's motion to stay discovery pending resolution of
5 Defendants' motions to dismiss or strike. Defendant also objects to this Request on the grounds that
6 it is overbroad, irrelevant, and not proportional to the needs of this Action, especially to the extent
7 it requests "[a]ll DOCUMENTS that refer to PlainSite" without any connection to the allegations in
8 this Action or timeframe. Defendant further objects to this Request to the extent it seeks information
9 that is confidential or subject to any protective order, privacy interest, contractual obligation, or
10 other confidentiality obligation owed to any third party. Defendant further objects to this Request
11 on the grounds and to the extent that it seeks documents that are protected from disclosure by the
12 attorney-client privilege, the work product doctrine, or any other applicable privilege. Such
13 documents will not be produced.

14
15 **REQUEST FOR PRODUCTION NO. 3:**

16 All DOCUMENTS that refer to Omar Qazi.

17 **RESPONSE TO REQUEST FOR PRODUCTION NO. 3:**

18 Defendant incorporates the foregoing Preliminary Statement and General Objections by
19 reference as though fully set forth herein. Defendant specifically objects to this Request as
20 premature for the reasons explained in Defendant's motion to stay discovery pending resolution of
21 Defendants' motions to dismiss or strike. Defendant also objects to this Request on the grounds that
22 it is overbroad, irrelevant, and not proportional to the needs of this Action, especially to the extent
23 it requests "[a]ll DOCUMENTS that refer to Omar Qazi" without any connection to the allegations
24 in this Action or timeframe. Defendant further objects to this Request to the extent it seeks
25 information that is confidential or subject to any protective order, privacy interest, contractual
26 obligation, or other confidentiality obligation owed to any third party. Defendant further objects to
27 this Request on the grounds and to the extent that it seeks documents that are protected from
28

1 disclosure by the attorney-client privilege, the work product doctrine, or any other applicable
2 privilege. Such documents will not be produced.

3
4 **REQUEST FOR PRODUCTION NO. 4:**

5 All DOCUMENTS that refer to SHORT SELLERS or contain the word “short” or “shorts.”

6 **RESPONSE TO REQUEST FOR PRODUCTION NO. 4:**

7 Defendant incorporates the foregoing Preliminary Statement and General Objections by
8 reference as though fully set forth herein. Defendant specifically objects to this Request as
9 premature for the reasons explained in Defendant’s motion to stay discovery pending resolution of
10 Defendants’ motions to dismiss or strike. Defendant further objects to this Request on the grounds
11 that it is overbroad, irrelevant, and not proportional to the needs of this Action, especially to the
12 extent it requests “[a]ll DOCUMENTS that refer to [short sellers] or contain the word ‘short’ or
13 ‘shorts’” without any connection to the allegations in this Action or timeframe. Defendant further
14 objects to this Request to the extent it seeks information that is confidential or subject to any
15 protective order, privacy interest, contractual obligation, or other confidentiality obligation owed to
16 any third party. Defendant further objects to this Request on the grounds and to the extent that it
17 seeks documents that are protected from disclosure by the attorney-client privilege, the work product
18 doctrine, or any other applicable privilege. Such documents will not be produced.

19
20 **REQUEST FOR PRODUCTION NO. 5:**

21 All DOCUMENTS containing the term “Atlanteca.”

22 **RESPONSE TO REQUEST FOR PRODUCTION NO. 5:**

23 Defendant incorporates the foregoing Preliminary Statement and General Objections by
24 reference as though fully set forth herein. Defendant specifically objects to this Request as
25 premature for the reasons explained in Defendant’s motion to stay discovery pending resolution of
26 Defendants’ motions to dismiss or strike. Defendant further objects to this Request on the grounds
27 that it is overbroad, irrelevant, and not proportional to the needs of this Action, especially to the
28 extent it requests “[a]ll DOCUMENTS containing the term ‘Atlanteca’” without any connection to

1 the allegations in this Action or timeframe. Defendant further objects to this Request to the extent
2 it seeks information that is confidential or subject to any protective order, privacy interest,
3 contractual obligation, or other confidentiality obligation owed to any third party. Defendant further
4 objects to this Request on the grounds and to the extent that it seeks documents that are protected
5 from disclosure by the attorney-client privilege, the work product doctrine, or any other applicable
6 privilege. Such documents will not be produced.

7
8 **REQUEST FOR PRODUCTION NO. 6:**

9 All DOCUMENTS to or from any atlanteca.com e-mail address.

10 **RESPONSE TO REQUEST FOR PRODUCTION NO. 6:**

11 Defendant incorporates the foregoing Preliminary Statement and General Objections by
12 reference as though fully set forth herein. Defendant specifically objects to this Request as
13 premature for the reasons explained in Defendant's motion to stay discovery pending resolution of
14 Defendants' motions to dismiss or strike. Defendant further objects to this Request on the grounds
15 that it is overbroad, irrelevant, and not proportional to the needs of this Action, especially to the
16 extent it requests "[a]ll DOCUMENTS to or from any atlanteca.com e-mail address" without any
17 connection to the allegations in this Action or timeframe. Defendant further object to this request
18 to the extent that it is duplicative of Request No. 5. Defendant further objects to this Request to the
19 extent it seeks information that is confidential or subject to any protective order, privacy interest,
20 contractual obligation, or other confidentiality obligation owed to any third party. Defendant further
21 objects to this Request on the grounds and to the extent that it seeks documents that are protected
22 from disclosure by the attorney-client privilege, the work product doctrine, or any other applicable
23 privilege. Such documents will not be produced.

24
25 **REQUEST FOR PRODUCTION NO. 7:**

26 All DOCUMENTS to or from Jared Birchall.
27
28

1 **RESPONSE TO REQUEST FOR PRODUCTION NO. 7:**

2 Defendant incorporates the foregoing Preliminary Statement and General Objections by
3 reference as though fully set forth herein. Defendant specifically objects to this Request as
4 premature for the reasons explained in Defendant's motion to stay discovery pending resolution of
5 Defendants' motions to dismiss or strike. Defendant also objects to this Request on the grounds that
6 it is overbroad, irrelevant, and not proportional to the needs of this Action, especially to the extent
7 it requests "[a]ll DOCUMENTS to or from Jared Birchall" without any connection to the allegations
8 in this Action or timeframe. Defendant further objects to this Request to the extent it seeks
9 information that is confidential or subject to any protective order, privacy interest, contractual
10 obligation, or other confidentiality obligation owed to any third party. Defendant further objects to
11 this Request on the grounds and to the extent that it seeks documents that are protected from
12 disclosure by the attorney-client privilege, the work product doctrine, or any other applicable
13 privilege. Such documents will not be produced.

14
15 **REQUEST FOR PRODUCTION NO. 8:**

16 All DOCUMENTS discussing TESLA's stock price in YOUR e-mails, text messages, Signal
17 Messages, or Twitter direct messages, from June 1, 2018 through December 31, 2020.

18 **RESPONSE TO REQUEST FOR PRODUCTION NO. 8:**

19 Defendant incorporates the foregoing Preliminary Statement and General Objections by
20 reference as though fully set forth herein. Defendant specifically objects to this Request as
21 premature for the reasons explained in Defendant's motion to stay discovery pending resolution of
22 Defendants' motions to dismiss or strike. Defendant also objects to this Request on the grounds that
23 it is overbroad, irrelevant, and not proportional to the needs of this Action, especially to the extent
24 it requests "[a]ll DOCUMENTS discussing [Tela's] stock price" without any connection to the
25 allegations in this Action. The Request also seeks documents before any conduct alleged in the
26 complaint occurred, and before Plaintiff even claims to have purchased any put options. Defendant
27 further objects to this Request to the extent it seeks information that is confidential or subject to any
28 protective order, privacy interest, contractual obligation, or other confidentiality obligation owed to

1 any third party. Defendant further objects to this Request on the grounds and to the extent that it
2 seeks documents that are protected from disclosure by the attorney-client privilege, the work product
3 doctrine, or any other applicable privilege. Such documents will not be produced.
4

5 **REQUEST FOR PRODUCTION NO. 9:**

6 All DOCUMENTS discussing preparations for filing the ALAMEDA CASE.

7 **RESPONSE TO REQUEST FOR PRODUCTION NO. 9:**

8 Defendant incorporates the foregoing Preliminary Statement and General Objections by
9 reference as though fully set forth herein. Defendant specifically objects to this Request as
10 premature for the reasons explained in Defendant’s motion to stay discovery pending resolution of
11 Defendants’ motions to dismiss or strike. Defendant further objects to this Request on the grounds
12 and to the extent that it seeks documents that are protected from disclosure by the attorney-client
13 privilege, the work product doctrine, or any other applicable privilege. Such documents will not be
14 produced. Defendant further objects to this Request on the grounds that it is overbroad, irrelevant,
15 and not proportional to the needs of this Action, especially to the extent it requests “[a]ll
16 DOCUMENTS discussing preparations for filing the ALAMEDA CASE” without any connection
17 to the allegations in this Action or timeframe. Defendant further objects to this Request to the extent
18 it seeks information that is confidential or subject to any protective order, privacy interest,
19 contractual obligation, or other confidentiality obligation owed to any third party.
20

21 **REQUEST FOR PRODUCTION NO. 10:**

22 All DOCUMENTS pertaining to any federal investigation in which YOU have been or are
23 scheduled to be deposed.

24 **RESPONSE TO REQUEST FOR PRODUCTION NO. 10:**

25 Defendant incorporates the foregoing Preliminary Statement and General Objections by
26 reference as though fully set forth herein. Defendant specifically objects to this Request as
27 premature for the reasons explained in Defendant’s motion to stay discovery pending resolution of
28 Defendants’ motions to dismiss or strike. Defendant further objects to this Request on the grounds

1 that it is overbroad, irrelevant, and not proportional to the needs of this Action, especially to the
2 extent it requests “[a]ll DOCUMENTS pertaining to any federal investigation in which [you] have
3 been or are scheduled to be deposed” without any connection to the allegations in this Action.
4 Defendant further objects to this Request on the grounds and to the extent that it seeks documents
5 that are protected from disclosure by the attorney-client privilege, the work product doctrine, or any
6 other applicable privilege. Such documents will not be produced. Defendant further objects to this
7 Request to the extent it seeks information that is confidential or subject to any protective order,
8 privacy interest, contractual obligation, or other confidentiality obligation owed to any third party,
9 including the federal government.

10
11 DATED: November 18, 2024

QUINN EMANUEL URQUHART &
SULLIVAN, LLP

12
13
14 By/s/ Anthony P. Alden

Anthony P. Alden

Danielle Shrader-Frechette

15
16 *Attorneys for Defendants Elon Musk, Tesla, Inc.,*
17 *the Elon Musk Revocable Trust dated July 22,*
18 *2003, Excession, LLC, Jared Birchall, Singer*
19 *Cashman LLP, Allison Huebert, Adam S.*
20 *Cashman, Adam G. Mehes, and Alex Spiro*
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1 **CERTIFICATE OF SERVICE**

2 I certify that on November 18, 2024, I served true copies of the following document
3 described as:

4 **1. Defendant Elon Musk's Responses and Objections to Plaintiff's First Set of Requests**
5 **for Production.**

6 On the interested parties as follows:

7 Plaintiff:

8 Aaron Greenspan
9 956 Carolina Street
10 San Francisco, CA 94107-3337

11 Defendants:

12 Willenken LLP
13 Kenneth M. Trujillo-Jamison
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Counsel for Morgan Stanley & Company, LLC

Omar Oazi
3825 Del Amo Boulevard
Torrance, California 90503

Smick Enterprises, Inc.
2067 Greenwich Street, Apt. 2
San Francisco, CA 94123

BY MAIL: I enclosed the document(s) in a sealed envelope or package addressed to the persons at the addresses listed in the Service List and placed the envelope for collection and mailing, following our ordinary business practices. I am readily familiar with the practice of Quinn Emanuel Urquhart & Sullivan, LLP for collecting and processing correspondence for mailing. On the same day that correspondence is placed for collection and mailing, it is deposited in the ordinary course of business with the United States Postal Service, in a sealed envelope with postage fully prepaid. I am a resident or employed in the county where the mailing occurred. The envelope was placed in the mail at Los Angeles, California. I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

DATE: November 18, 2024

/s/ Trish Goforth
Trish Goforth