IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS

RYAN, LLC, Plaintiff, v. FEDERAL TRADE COMMISSION, Defendant.	Civil Action No. 3:24-cv-986-E

RYAN, LLC'S MOTION FOR EXPEDITED BRIEFING REGARDING ITS MOTION FOR STAY OF EFFECTIVE DATE AND PRELIMINARY INJUNCTION

EXPEDITED TREATMENT REQUESTED

Plaintiff Ryan, LLC ("Ryan") files a motion for expedited briefing regarding its motion for a stay of effective date and preliminary injunction under Federal Rule of Civil Procedure 65 and states the following:

1. Ryan has filed a motion seeking a stay of effective date (September 4, 2024) and preliminary injunction of Defendant Federal Trade Commission's Non-Compete Clause Rule and preliminarily enjoining the Commission from enforcing the Rule, including, but not limited to, through any ongoing or future administrative action.

2. For the reasons explained in the attached brief, Ryan respectfully requests an expedited briefing schedule under which the Commission files an

opposition to the motion for a stay and preliminary injunction by **May 15, 2024**, and Ryan files a reply brief by **May 22, 2024**. Further, Ryan respectfully requests a hearing **within 21 days after completion of briefing** and a decision from this Court on its motion for a stay and preliminary injunction **within 21 days of the hearing—i.e., by July 3, 2024**.

Respectfully submitted,

Dated: May 1, 2024

/s/ Allyson N. Ho

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CERTIFICATE OF CONFERENCE

I hereby certify that on April 30, 2024, Andrew Kilberg and Aaron Hauptman, who are counsel for Plaintiff, conferred by telephone and email with Rachael Westmoreland and Madeline McMahon, who are counsel for Defendant, regarding Plaintiff's intent to file this motion. Counsel for Defendant stated their position as follows: "Defendants dispute that Plaintiff has good cause for departing from the default schedule under the local rules, and oppose the relief sought herein. Defendants intend to file an opposition to the instant motion."

Dated: May 1, 2024

Respectfully submitted,

/s/ Andrew G. I. Kilberg

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CERTIFICATE OF SERVICE

I hereby certify that, on May 1, 2024, I caused the foregoing motion to be filed with the Clerk for the U.S. District Court for the Northern District of Texas through the ECF system. Participants in the case who are registered ECF users will be served through the ECF system, as identified by the Notice of Electronic Filing.

Dated: May 1, 2024

Respectfully submitted,

/s/ Allyson N. Ho

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