

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
Miami Division**

PRESIDENT DONALD J. TRUMP, an individual,

Plaintiff,

v.

DOW JONES & COMPANY, INC. d/b/a THE WALL STREET JOURNAL, a Delaware corporation, NEWS CORPORATION, a Delaware corporation, KEITH RUPERT MURDOCH, an individual, ROBERT THOMSON, an individual, KHADEEJA SAFDAR, an individual, and JOSEPH PALAZZOLO, an individual,

Defendants.

Case No.: 1:25-cv-23232-DPG

**JOINT STIPULATION REGARDING PLAINTIFF’S MOTION TO
COMPEL EXPEDITED DEPOSITION *DE BENE ESSE* OF DEFENDANT
KEITH RUPERT MURDOCH AND INCORPORATED MEMORANDUM OF LAW**

Plaintiff President Donald J. Trump (“Plaintiff” or “President Trump”) and Defendants Dow Jones & Company, Inc. d/b/a The Wall Street Journal, News Corporation, Keith Rupert Murdoch (“Murdoch”), Robert Thomson (“Thomson”), Khadeeja Safdar, and Joseph Palazzolo (together, “Defendants”) (Plaintiff and Defendants together, “Parties”), by and through undersigned counsel and pursuant to Federal Rule of Civil Procedure 29, hereby file this Joint Stipulation Regarding Motion to Compel Expedited Deposition *De Bene Esse* of Defendant Keith Rupert Murdoch and Incorporated Memorandum of Law [ECF No. 23] (“Stipulation”). In support, the Parties state as follows:

1. Subject to the terms of this Stipulation, together with a separately signed Abatement Agreement, which contains additional procedural details related to this Stipulation, Plaintiff agrees to abate his pending Motion to Compel Expedited Deposition *De Bene Esse* of Defendant Keith

Rupert Murdoch and Incorporated Memorandum of Law [ECF No. 23] (“Motion to Compel Deposition”).

2. Until Defendants’ Motion to Dismiss the Complaint is adjudicated, the Parties agree not to engage in discovery. However, during the pendency of Defendants’ Motion to Dismiss, and before it is adjudicated, the Parties shall conduct the Rule 26(f) conference and exchange Initial Disclosures. If any of the Parties believe that discovery is required during this timeframe, notwithstanding their agreement reflected in this paragraph, a joint motion would be required to seek that discovery.

3. Defendants Murdoch and Thomson waive any argument relating to personal jurisdiction in this matter.

4. Upon Defendants’ Motion to Dismiss the Complaint being denied, Defendant Murdoch’s deposition shall occur in person, at a mutually agreed upon location in the United States, and no later than thirty (30) calendar days after the Motion to Dismiss is denied.

5. Within three (3) calendar days from the date that an Order approving this Stipulation is entered, Defendant Murdoch shall provide Plaintiff with a sworn declaration describing his current health condition. Defendant Murdoch has further agreed to provide regularly scheduled updates to the Plaintiff regarding his health, including a mechanism for him to alert the Plaintiff if there is a material change in his health. Failure to provide updates in the agreed-upon manner as set forth in the Abatement Agreement shall result in an expedited deposition of Defendant Murdoch.

WHEREFORE, the Parties respectfully request that the Court enter an Order approving this Stipulation and grant any other relief the Court deems proper.

Dated: August 4, 2025

Respectfully submitted,

/s/ Alejandro Brito

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Corporation, Keith Rupert Murdoch, Robert
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was filed on this 4th day of August 2025 through the Florida Courts E-filing Portal upon:

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