

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF CONNECTICUT**

JAMES RICHARD HILL, III, individually,
and on behalf of all others similarly situated,
and on behalf of the Plan,

Plaintiff,

v.

XPO, INC. and GXO LOGISTICS, INC.,

Defendants.

Case No. 3:24-cv-01697-SFR

July 31, 2026

DEFENDANT XPO’S MOTION TO STAY DISCOVERY

Defendant XPO, Inc. (“XPO”) hereby moves to stay discovery pending resolution of its motion for judgment on the pleadings (“MJOP”), filed on May 29, 2026 (Dkt. 99). The MJOP, if granted, would resolve all claims against XPO and is fully-briefed as of July 27, 2026, *see* Dkt. 100; Dkt. 107; Dkt. 110. As set forth in greater detail in the accompanying Memorandum of Law, the Court should stay discovery pending resolution of the MJOP because (1) the MJOP raises substantial grounds for dismissal of all claims against XPO, (2) discovery in this case would be extensive and asymmetrically burdensome, and (3) a brief continuation of the stay would not prejudice Plaintiff. XPO therefore respectfully requests that the Court grant its Motion to Stay Discovery.

Dated: July 31, 2026

Respectfully submitted,

/s/ Jaime A. Santos

Jaime A. Santos

Isabel M. Marin (*pro hac vice*)

GOODWIN PROCTER LLP

1900 N Street NW

Washington, D.C. 20036

Tel.: (202) 346-4000
JSantos@goodwinlaw.com
IMarin@goodwinlaw.com

James O. Fleckner (*pro hac vice*)
GOODWIN PROCTER LLP
100 Northern Avenue
Boston, MA 02210
Tel.: (617) 570-1000
Fax: (617) 523-1231
JFleckner@goodwinlaw.com

*Counsel for Defendant XPO,
Inc.*

CERTIFICATE OF SERVICE

I, Jaime A. Santos, certify that a copy of the foregoing motion, filed through the CM/ECF system, will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) on July 31, 2026.

Dated: July 31, 2026

/s/ Jaime A. Santos
Jaime A. Santos