CAUSE NO. 20-08-26306

IN THE MATTER OF THE	§	IN THE COUNTY COURT AT LAW
MARRIAGE OF	§	
	§	
JAY KEITH SEARS	§	OF
AND	§	
DEBRA LOUISE McLEOD	δ	WALLER COUNTY, TEXAS

JAY KEITH SEARS' MOTION FOR CONTINUANCE

Respondent Jay Keith Sears ("Sears") moves the Court to continue the September 30, 2025 hearing on Dolcefino Communications, LLC d/b/a Dolcefino Media's ("Dolcefino") Motion to Unseal, and in support would show the following:

I. Background

- 1. On August 28, 2025, the Fourteenth Court of Appeals issued its opinion in *In re Dolcefino Communications, LLC d/b/a Dolcefino Media*, No. 14-25-00555-CV.
- 2. The court of appeals left to this Court a fact-based determination whether Dolcefino qualifies as "media."
- 3. This factual issue is a threshold matter that must be resolved before any ruling on what, if any, records may be unsealed.

II. Pending Discovery

- 4. On April 25, 2025, Mr. Sears served a subpoena on Dolcefino directed at documents relevant to its claimed "media" status.
 - 5. Dolcefino refused to respond and instead filed a Motion to Quash.
- 6. The requested discovery is directly relevant to the threshold factual issue identified by the Court of Appeals.