

SUPERIOR COURT OF THE DISTRICT OF COLUMBIA
Civil Division

**Estate of ROBERT E. WONE, by
KATHERINE E. WONE,**

Plaintiff,

v.

JOSEPH R. PRICE,

VICTOR ZABORSKY,

and

DYLAN WARD,

Defendants.

Civil Action No. 0008315-08

The Honorable Brook Hedge

**Next Event: December 15, 2010
Exchange Witness Lists/Deadline
For Discovery Requests**

**JOINT MOTION TO STAY RESPONSE DEADLINE AND
RULING IN REGARD TO PLAINTIFF'S MOTION TO
COMPEL PRODUCTION OF THIRD-PARTY DOCUMENTS**

Plaintiff Estate of Wone and Defendant Joseph R. Price, by undersigned counsel, hereby jointly move for an indefinite stay of Defendant Price's deadline for responding to Plaintiff's Motion to Compel Production of Third-Party Documents and for a stay of the Court's decision on the underlying Motion, and in support, state:

1. The parties have reached a compromise-in-principle regarding the issues raised in the Plaintiff's Motion to Compel, which calls for production by Defendant Price of some, but not all, of the documents at issue in the Motion. Assuming Defendant Price produces the materials that have been agreed to, the parties anticipate that the Motion will be withdrawn in the near future.

2. In light of the parties' agreement-in-principle, they ask that this Court indefinitely stay its ruling on the Motion, as well as Defendant Price's response time,

until such time as the Plaintiff withdraws the Motion or either of the parties requests that the stay be lifted.

3. Justice requires the requested relief.

WHEREFORE, Plaintiff Defendant Joseph Price respectfully requests that this Honorable Court stay its ruling on Plaintiff's Motion to Compel, as well as Defendant Price's response deadline, until such time as the Plaintiff withdraws the Motion or either of the parties requests that the stay be lifted.

Respectfully submitted,

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STATEMENT OF POINTS AND AUTHORITIES

D.C. Superior Court Civ. Rule 6(b)
D.C. Superior Court Civ. Rule 12-I(a)
D.C. Superior Court Civ. Rule 12-I(e)

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 1st day of October, 2010, a copy of the foregoing Joint Motion to Stay Response Deadline and Ruling in Regard to Plaintiff's Motion to Compel Production of Third-Party Documents, Statement of Points and Authorities, and proposed Order were served via this Court's electronic case filing system on the following counsel of record:

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