

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION**

ROY COCKRUM, ET AL.,

Plaintiffs,

v.

DONALD J. TRUMP FOR PRESIDENT, INC.,

Defendant.

Case No. 3:18-cv-484-HEH

**DEFENDANT DONALD J. TRUMP FOR PRESIDENT, INC.'S
MOTION FOR STAY OF DISCOVERY**

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Counsel for Donald J. Trump for President, Inc.

Defendant Donald J. Trump for President, Inc. (Campaign) respectfully moves that the Court stay all discovery in this lawsuit until the Court resolves the Campaign's pending motion to dismiss.

In accordance with Local Civil Rule 37(E), counsel for the Campaign has conferred with counsel for Plaintiffs in good faith in order to resolve this controversy. Counsel for Plaintiffs have stated that Plaintiffs take the following position:

Plaintiffs oppose Defendant's motion to stay discovery. However, as a professional courtesy in light of the upcoming initial pretrial conference, Plaintiffs do not object to a five-day extension of the deadline under Local Rule of Civil Procedure 26(C) and paragraph III.5 of this Court's Pretrial Schedule A (ECF No. 68-1) for objecting to Plaintiffs' First Set of Requests for Production, which were served on Defendant on January 8, 2019.

Dated: January 11, 2019

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Respectfully submitted,

/s/ Nikki L. McArthur

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CERTIFICATE OF SERVICE

I certify that on January 11, 2019, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will send a notice of electronic filing to all registered parties.

Dated: January 11, 2019

/s/ Nikki L. McArthur

Nikki L. McArthur

Counsel for Donald J. Trump for President, Inc.