



No. 11. In his motion to dismiss, the Attorney General raised serious doubts regarding the Plaintiffs' failure to establish their standing to challenge the constitutionality of Section 5. Defendant-Intervenors have also filed a motion to dismiss. Dkt. No. 25. Before this Court has had a chance to rule on the jurisdictional issues raised by the Attorney General's motion to dismiss, Plaintiffs moved for summary judgment. Dtk. No. 23.

Imposing a temporary stay in the instant case will conserve judicial and party resources. The Attorney General believes that extensive discovery will be necessary to respond adequately to Plaintiffs' motion for summary judgment. Discovery will cause the parties to expend significant resources and may subject this Court to lengthy motions practice. However, those costs can be avoided by staying summary judgment proceedings pending resolution of all Defendants' motions to dismiss. Moreover, granting the requested stay would impose no hardship on the Plaintiffs.

The Attorney General respectfully asks this Court to stay further proceedings on the Plaintiffs' summary judgment motion until this Court rules on Defendant's and Defendant-Intervenors' pending motions to dismiss. As required by Local Rule 7(m), the Attorney General has conferred with counsel for the other parties. Plaintiffs' counsel opposes this motion to stay; Defendant-Intervenors' counsel concurs in the motion and will not be filing a separate pleading.

The basis for this motion is set forth in the accompanying memorandum.

Date: September 3, 2010

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CERTIFICATE OF SERVICE

I hereby certify that on September 3, 2010, I served a true and correct copy of the foregoing via the Court's ECF system, to the following counsel of record:

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