

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

REV. XIU HUI “JOSEPH” JIANG,)
)
Plaintiffs,)
)
v.) Case No. 4:15-cv-01008
)
TONYA LEVETTE PORTER,)
JAIMIE D. PITTERLE,)
CITY OF ST. LOUIS, MISSOURI,)
A.M., N.M., SURVIVORS NETWORK)
OF THOSE ABUSED BY PRIESTS,)
DAVID CLOHESSY, and)
BARBARA DORRIS,)
)
Defendants.)

**MOTION TO STAY PORTIONS OF ORDER RELATING TO MOTION TO
RECONSIDER UNTIL RULING ON MOTION TO RECONSIDER**

COMES NOW the SNAP Defendants, and for their Motion state as follows:

1. The Court ruled on Plaintiff’s Motion to Compel on 6/27/16, giving SNAP until 7/11/16 to produce the materials that were subject to the Order.
2. SNAP has filed a motion for reconsideration of two parts of that Order. Plaintiff has already filed a response to that motion.
3. Because SNAP can’t “unproduce” or “undisclose” documents once they are produced in the event it is successful on the motion for reconsideration, SNAP respectfully requests that the Court stay the portions of the Order that are subject to reconsideration until the Court has had the opportunity to rule upon that motion.
4. No party will be prejudiced by the granting of this motion, and it is necessary to have full consideration of the issues raised in the motion.
5. Plaintiff has been asked for his position on this issue, and has not yet responded.

WHEREFORE, the SNAP Defendants respectfully request that the Court hold its order in abeyance with regard to the subjects of the motion to reconsider until such time as it has ruled upon the motion to reconsider, and for such further relief as is just and appropriate in this circumstances.

Respectfully submitted:

CARPENTER MOSER, LLC

/s/ Amy Lorenz-Moser

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*Attorneys for Defendants SNAP, David Clohessy,
and Barbara Dorris*

CERTIFICATE OF SERVICE

I hereby certify that on this 13th day of July, 2016, a copy of the foregoing was electronically filed with the Court, and will be sent electronically by the Court to counsel of Record:

/s/ Amy Lorenz-Moser