

IN THE COURT OF COMMON PLEAS
FRANKLIN COUNTY, OHIO

THE BUCKEYE INSTITUTE, ET AL.,	:	
	:	
PLAINTIFFS,	:	CASE NO. 20CV-4301
	:	
V.	:	JUDGE WILLIAM WOODS
	:	
MEGAN KILGORE, ET AL.,	:	
	:	
DEFENDANTS.	:	

**JOINT MOTION TO STAY DISCOVERY PENDING RESOLUTION OF
DEFENDANTS’ MOTIONS TO DISMISS**

Now come Plaintiffs, The Buckeye Institute, Greg R. Lawson, Rea S. Hederman, and Joe Nichols jointly with Defendants Megan Kilgore, in her official capacity as Columbus City Auditor, and Dave Yost, in his official capacity as Ohio Attorney General, (collectively, the “Parties”), and move this Court for a stay of all discovery, including Initial Joint Disclosures of All Witnesses, pending resolution of the Defendants’ respective motions to dismiss. A stay of discovery will serve the interests of economy and efficiency for both the Parties and the Court. Accordingly, the Parties jointly request that the Court stay all discovery pending resolution of Defendants’ motions to dismiss.

Respectfully submitted,

ICE MILLER LLP

/s/ Diane Menashe

Diane Menashe (0070305)

Phone No. (614) 221-6500

Fax No. (614) 222-3468

Diane.Menashe@icemiller.com

Daniel Anderson (0067041)

Phone No. (614) 462-5013

Fax No. (614) 224-3216

Daniel.Anderson@icemiller.com

250 West Street, Suite 700

Columbus, Ohio 43215

Mark J. Richards PHV No. 18407-2020

Phone No. (317) 236-2379

Fax No. (317) 592-4739

Mark.Richards@icemiller.com

One American Square Suite 2900

Indianapolis, IN 46282-0200

*Counsel for Defendant Megan Kilgore,
in her Official Capacity as Columbus City
Auditor*

DAVE YOST

OHIO ATTORNEY GENERAL

/s/ Zachary M. Holscher (with email authorization)

ZACHARY M. HOLSCHER (0098039)*

*Counsel of Record

HALLI BROWNFIELD WATSON (0082466)

Assistant Attorneys General

Constitutional Offices Section

30 East Broad Street, 16th Floor

Columbus, Ohio 43215

Tel: (614) 466-2872

Fax: (614) 728-7592

Zachary.Holscher@OhioAttorneyGeneral.gov

Halli.Watson@OhioAttorneyGeneral.gov

*Counsel for Defendant Ohio Attorney General Dave
Yost*

WEGMAN HESSLER, L.P.A

/s/ Jay R. Carson (with email authorization)

Jay R. Carson (0068526)

6055 Rockside Woods Boulevard

Cleveland, Ohio 44131

(216) 642-3342

Fax- (216) 520-0145

jrcarson@wegmanlaw.com

Robert Alt (0091753)

THE BUCKEYE INSTITUTE

88 East Broad Street, Suite 1300

Columbus, Ohio 43215

(614) 224-4422

robert@buckeyeinstitute.org

*Counsel for Plaintiffs The Buckeye Institute,
Greg R. Lawson, Rea S. Hederman, and Joe Nichols*

CERTIFICATE OF SERVICE

I hereby certify that an exact copy of the foregoing Joint Motion to Stay Discovery Pending Resolution of Defendants' Motions to Dismiss was served by way of the Clerk's electronic filing system to those registered on November 16, 2020:

Jay R. Carson
jrcarson@wegmanlaw.com

Robert Alt
robert@buckeyeinstitute.org

*Attorneys for Plaintiffs The Buckeye Institute,
Greg R. Lawson, Rea S. Hederman, and Joe Nichols*

Respectfully submitted,

/s/ Diane Menashe
Diane Menashe (0070305)

*Counsel for Defendant Megan Kilgore, in her
Official Capacity as Columbus City Auditor*