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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF ARKANSAS

FEDERAL TRADE COMMISSION, and STATE OF ARKANSAS, *ex rel.* LESLIE RUTLEDGE, ATTORNEY GENERAL Plaintiffs, vs. BINT OPERATIONS LLC, a limited liability company, LASHONDA MOORE, individually and as an officer of BINT OPERATIONS LLC, and MARLON DEANDRE MOORE, formerly known as MARLON DEANDRE MAIDEN, individually and as an officer of BINT OPERATIONS LLC Defendants.	CASE NO.: 4:21-CV-00518-KGB **DEFENDANTS' MOTION TO STAY DISCOVERY PENDING ADJUDICATION OF DEFENDANTS' MOTION TO DISMISS**

COMES NOW, Defendants BINT Operations LLC ("BINT"), LaShonda Moore, and Marlon Deandre Moore (collectively, "Defendants") who file this Motion to Stay Discovery

Pending Adjudication of Defendants' Motion to Dismiss (the "Motion") and would respectfully show the Court as follows:

1. On August 4, 2021, Defendants' filed their Motion to Dismiss for Lack of Personal Jurisdiction and Improper Venue, or, in the Alternative, Motion to Transfer Venue pursuant to Rule 12(b)(2) and 12(b)(3) of the Federal Rules of Civil Procedure and 28 U.S.C. §§1404 and 1406 (the "Motion to Dismiss").

2. On December 22, 2021, this Court entered an Initial Scheduling Order, detailing certain deadlines for discovery and proposed trial dates, which is hereby objected to.

3. Counsel for Defendants and counsel for Plaintiffs held an initial conference to discuss Rule 26(f) on January 12, 2022, wherein Defendants raised their objection to Rule 26(a)(1)(C) in addition to subsequent discovery deadlines, including but not limited to initial disclosures.

4. Defendants hereby move that all discovery, including that which has already been propounded (which is none) and any that may be propounded in the future, be stayed pending a ruling on Defendants' Motion to Dismiss.

5. In support of this Motion, Defendants respectfully refer the Court to the Memorandum in Support of the Motion filed herewith.

II. PRAYER

WHEREFORE, Defendants respectfully request this Court grant their Motion to Stay Discovery Pending Adjudication of Defendants' Motion to Dismiss by entering an order staying discovery in this case until the Court rules on Defendants' Motion to Dismiss. Alternatively, in light of this Motion, Defendants additionally request that this Court grant Defendants an extension of time to comply with the deadlines under Rule 26 of the Federal Rules of Civil Procedure.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on or about the 18th day of January, 2022, a true and correct copy of the above and foregoing pleading was electronically filed with the Clerk of the Court by using CM/ECF service which will provide copies to all counsel of record registered to receive CM/ECF notification.

Donald E. Godwin