

**Gunn, Christina S.**

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**From:** Raymond Bryant <raymond@rightslitigation.com>  
**Sent:** Monday, April 16, 2018 1:42 PM  
**To:** Gunn, Christina S.  
**Cc:** Lyons, Thomas J.; Marion, Nicole  
**Subject:** Re: Montgomery - Conferral for Motion to Stay Discovery

We oppose.

On Mon, Apr 16, 2018 at 1:28 PM, Gunn, Christina S. <[gunnc@hallevans.com](mailto:gunnc@hallevans.com)> wrote:

Mr. Bryant,

I would like to file the Motion for a Stay of Discovery; please let me know your position.

Thanks,

Christina Gunn

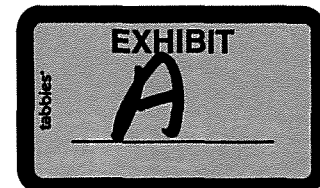
**Christina S. Gunn** | Member  
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**From:** Raymond Bryant [<mailto:raymond@rightslitigation.com>]  
**Sent:** Wednesday, April 11, 2018 9:27 AM  
**To:** Gunn, Christina S. <[gunnc@hallevans.com](mailto:gunnc@hallevans.com)>  
**Cc:** Lyons, Thomas J. <[lyonst@hallevans.com](mailto:lyonst@hallevans.com)>; Marion, Nicole <[marionn@hallevans.com](mailto:marionn@hallevans.com)>  
**Subject:** Re: Montgomery - Conferral for Motion to Stay Discovery

Christina,



Let me get back to you about this Monday. I have not yet had a chance to review the motion to dismiss in detail. If there are defects that can be addressed with an amendment, any amendment we file will moot out the motion and your basis for a request to stay.

On Tue, Apr 10, 2018 at 9:54 AM, Gunn, Christina S. <[gunnc@hallevans.com](mailto:gunnc@hallevans.com)> wrote:

Mr. Bryant,

Defendants intend to file a Motion to Stay Discovery pending ruling on Defendants' Motion to Dismiss due to Defendants' assertion of a qualified immunity defense to each of Plaintiff's claims. Please advise of Plaintiff's position related to this request for purposes of Local Rule 7.1 conferral.

Thanks,  
Christina Gunn

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