

**UNITED STATES DISTRICT COURT  
DISTRICT OF CONNECTICUT**

LAURI A. OSBOURNE, Individually and	)	
On Behalf of All Similarly Situated,	)	Civil Action No. 3:07-cv-00469 (RNC)
Plaintiff,	)	
	)	Class Action
v.	)	
	)	
MENU FOODS, INC.	)	April 19, 2007
Defendant,	)	

**DEFENDANT’S MOTION TO STAY ALL PROCEEDINGS**

The defendant hereby moves this Court to stay all proceedings in this action pending a transfer decision by the Judicial Panel on Multidistrict Litigation (“JPML”) pursuant to U.S.C. §1407 and pending a determination of class certification by the transferee court pursuant to Federal Rules of Civil Procedure 23(d)(1). The defendant specifically requests that the stay of proceedings apply to any obligation the defendant has to file a responsive pleading as well as the parties’ obligations with regard to filing a proposed case management plan under Federal Rule 26(f) and Local Rule 26(e).

A stay of all proceedings in this action pending a transfer decision by the JPML and a determination of class certification by the transferee court is necessary to promote judicial economy and avoid undue prejudice to the parties. Due to multiple pending MDL motions and

**ORAL ARGUMENT NOT REQUESTED  
TESTIMONY NOT REQUIRED**

pending motions for class certification, a stay of proceedings in this case is necessary and appropriate to further the interests of judicial economy. Absent a stay, the defendant will be substantially prejudiced if it is required to duplicate efforts and expend significant resources defending multiple cases in jurisdictions around the country. A memorandum in support hereof is attached.

WHEREFORE, the defendant respectfully requests that this Court enter an order staying further proceedings in this matter, including but not limited to the defendant's obligation to file responsive pleadings, pending the transfer decision by the Judicial Panel and a determination of class certification by the transferee court.

DEFENDANT,

/s/ Matthew G. Conway

BY: \_\_\_\_\_

Matthew G. Conway  
Fed. Bar. No. ct09612  
Jennifer Katz  
Fed. Bar. No. ct26887  
Conway & Stoughton, LLP  
818 Farmington Avenue  
West Hartford, CT 06119  
(860) 523-8000  
(860) 523-8002 (fax)

**CERTIFICATION**

I hereby certify that on the April 19, 2007, a copy of the foregoing document was filed electronically and served by mail on anyone unable to accept electronic filing. Notice of this filing will be sent by e-mail to all parties by operation of the court's electronic filing system or by mail to anyone unable to accept electronic filing as indicated on the Notice of Electronic Filing. Parties may access this filing through the court's CM/ECF System.

/s/ Matthew G. Conway

---

Matthew G. Conway