

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

CONSENT MOTION FOR STAY OF DISCOVERY

Defendant Ana Marie Cox (“Cox”) hereby moves for a stay of discovery in this case pending the Court’s ruling on her Motion to Dismiss.

On May 16, 2005, Plaintiff Robert Steinbuch (“Plaintiff”) filed his original Complaint, naming Defendant Jessica Cutler (“Cutler”) as the sole defendant. On July 9, 2006, Plaintiff filed a motion for leave to amend his Complaint in order to add Cox as a defendant, and the Court granted his motion on October 30, 2006. Cox was served on January 6, 2007. On January 26, 2007, Cox filed her Motion to Dismiss Plaintiff’s First Amended Complaint for failure to state a claim upon which relief can be granted, pursuant to Federal Rule of Civil Procedure 12(b)(6).

Cox requests that this Court stay all discovery with respect to her until the Court has decided her Motion to Dismiss. Because the motion may result in the dismissal of Plaintiff's claims against Cox in their entirety, it would unfairly prejudice Cox to impose the time and costs of discovery on her before the motion is resolved. It could also waste the other parties' resources to take potentially unnecessary discovery and – should disputes arise concerning such discovery which require the Court's intervention – it would squander judicial resources as well.

Counsel for Cox has consulted with counsel for Plaintiff and counsel for Cutler, who have consented to this motion. Counsel for Plaintiff has authorized us to state that he consents to a stay of all proceedings; counsel for Cutler has authorized us to state that Cutler consents to a stay of discovery, but not of the briefing and disposition of Cutler's pending motion. In sum, all parties are in agreement that discovery should be stayed pending resolution of this motion and the disagreement between the other two parties regarding the scope of the stay is immaterial for purposes of this stay motion.

Dated this 26th day of January, 2007.

Respectfully submitted,

/s/ Laura R. Handman

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STATEMENT OF CONSENT

Pursuant to Local Civil Rule 7.1(m), undersigned counsel hereby states that the required discussion with counsel for plaintiff occurred on January 25, 2007, and that counsel for Plaintiff does not oppose this motion. The required discussion with counsel for Defendant Cutler occurred on January 24, 2007, and counsel for Cutler does not oppose this motion.

/s/ James Rosenfeld
James Rosenfeld

CERTIFICATE OF SERVICE

I hereby certify that on January 26, 2007, I caused the foregoing to be served electronically on counsel of record by the U.S. District Court for the District of Columbia Electronic Document Filing System (ECF).

/s/ Amber L. Husbands
Amber L. Husbands