

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF HAWAII

YVONNE ORTIZ, Individually and)
on behalf of all other similarly)
situated persons,)

Plaintiff,)

vs.)

MENU FOODS, INC., a New Jersey)
corporation; MENU FOODS)
HOLDINGS, INC., a Delaware)
corporation; MENU FOODS)
INCOME FUND, an unincorporated)
Canadian business; DOE ENTITIES)
and INDIVIDUALS 1-100,)

Defendants.)

CIVIL NO. CV07-00323DAELEK
(Class Action)

MENU FOODS HOLDINGS, INC.’S
MOTION TO STAY ALL PROCEEDINGS

**MENU FOODS HOLDINGS, INC.’S
MOTION TO STAY ALL PROCEEDINGS**

Menu Foods Holdings, Inc., Defendant herein, hereby moves this Court for an Order staying this litigation pending the ruling by the Judicial Panel on Multidistrict Litigation (“MDL”) with respect to four (4) Motions to Transfer and Consolidate numerous Class Action Complaints, which applications were heard by MDL Panel on May 31, 2007, at the United States Courthouse in Las Vegas,

Nevada. In the alternative, Menu Foods Holdings, Inc., seeks an extension of time to file a responsive pleading to Plaintiff's Complaint until thirty (30) days after the decision by the MDL Panel with respect to the pending Motions to Transfer and Consolidate.

This motion is based on Rules 7.1 thru 7.6 of the Local Rules of the United States District Court for the District of Hawaii, Rule 7 of the Federal Rules of Civil Procedure, the memorandum and declaration attached hereto, and the records and files herein.

DATED: Honolulu, Hawaii, June 15, 2007.

/s/ Chad P. Love
CHAD P. LOVE
BARBARA J. KIRSCHENBAUM

Attorneys for Defendant Menu Foods
Holdings, Inc.