

4. It presently is unknown whether the conditions precedent to said agreement will be satisfied, and additional time is needed to determine whether they will be.

5. Therefore, Grochocinski, individually, and Defendants request that the court not rule on the pending Motion for Sanctions as against Grochocinski, in any capacity, but rather set the matter for a status hearing two months hence.

6. Said agreement is not applicable to the Motion for Sanctions as against Joyce, and this motion does not request that the Court delay ruling on the motion for sanctions as against Joyce.

WHEREFORE, Grochocinski, individually, and Defendants respectfully move this court to enter a stay of proceedings with respect to Defendant's Motion for Sanctions as against Grochocinski in any capacity.

Respectfully submitted,

DAVID GROCHOCINSKI, individually

By: /s/ David E. Morgans
One of His Attorneys

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By: /s/ Steven J. Ciszewski
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