

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF LOUISIANA**

VICKI L. PINERO, individually and on
behalf of all others similarly situated,

Plaintiff,

v.

JACKSON HEWITT TAX SERVICE
INC.; JACKSON HEWITT INC.; and,
CRESCENT CITY TAX SERVICE, INC.
d/b/a JACKSON HEWITT TAX
SERVICE,

Defendants.

CASE NO.: 08-3535

SECTION R

**JUDGE
SARAH VANCE**

**MAGISTRATE JUDGE
DANIEL E. KNOWLES**

MOTION TO STAY DISCOVERY

NOW INTO COURT, through undersigned counsel, come Defendants Jackson Hewitt Tax Service Inc. and Jackson Hewitt Inc. (collectively "Jackson Hewitt"), and, pursuant to Rule 26(c), respectfully request that this Court stay discovery until after a resolution of the pending Motion to Dismiss, for the reasons more fully explained in the attached Memorandum in Support.

WHEREFORE, for the foregoing reasons, Jackson Hewitt respectfully requests that this Court grant its Motion to Stay Discovery and orders that Plaintiff shall cease all discovery activities until the pending motion to dismiss is ruled on.

Respectfully submitted,

/s/Veronica D. Gray

Donna L. Wilson (Admitted *pro hac vice*)
Andrew S. Wein (Admitted *pro hac vice*)
Veronica D. Gray (Admitted *pro hac vice*)
KELLEY DRYE & WARREN LLP

3050 K Street, NW, Suite 400
Washington, DC 20007
Telephone: (202) 342-8400

AND

KEAN, MILLER, HAWTHORNE, D'ARMOND,
McCOWAN & JARMAN, L.L.P.
Glenn M. Farnet (#20185)
Gina D. Banks (#27440)
One American Place, 18th Floor
Post Office Box 3513
Baton Rouge, Louisiana 70825
Telephone: (225) 387-0999

**Attorneys for Jackson Hewitt Tax Service Inc.,
and Jackson Hewitt Inc.**