

IN THE UNITED STATES DISTRICT COURT
DISTRICT OF MARYLAND - BALTIMORE DIVISION

ALBERT SNYDER,

Plaintiff,

vs.

Case No. 1:06-cv-1389-RDB

FRED W. PHELPS, SR.;
SHIRLEY L. PHELPS-ROPER;
REBEKAH A. PHELPS-DAVIS; and,
WESTBORO BAPTIST CHURCH, INC.,
Defendants.

SUBMISSION OF FINANCIAL INFORMATION BY DEFENDANTS
IN SUPPORT OF MOTION FOR STAY PENDING APPEAL

Defendants Westboro Baptist Church, Inc. (WBC) and Fred W. Phelps, Sr., through the undersigned counsel, submit the following regarding their pending motion for stay, per the orders of the Court.

The declaration of Timothy B. Phelps on behalf of WBC is attached; items which are public records are included herewith; items which are submitted under seal are sent directly to the Court; all as set out in the declaration.

The declaration of Fred W. Phelps is attached; items which are public records are included herewith; items which are submitted under seal are sent directly to the Court; all as set out in the declaration.

Defendants' proposed plan is that they will preserve the status quo as to non-exempt property pending the appeal herein. Defendants do not in any way hereby waive any claim they or any other persons have to any exemption in any property, including homestead, by submitting these items as ordered by the Court. See concerning homestead in Kansas, *Redmond v. Kester*, 284 Kan. 209, 159 P.3d 1004 (2007); Kan. Const. Art. 15, §9; K.S.A. 60-2301.

Respectfully submitted,

MARKS & KATZ, L.L.C.

/s/ Jonathan L. Katz_____

Jonathan L. Katz

D.Md. Bar No. 07007

1400 Spring St., Suite 410

Silver Spring, MD 20910

(301) 495-4300

Fax: (301) 495-8815

jon@markskatz.com

Attorney for Defendants Westboro
Baptist Church, Inc. and Fred W.
Phelps, Sr.

CERTIFICATE OF SERVICE

I hereby certify that the foregoing filing was served on the 27th day of March, 2008, with unsealed public documents attached, as follows:

By CM/ECF filing:

Mr. Sean E. Summers, Esq.
Mr. Craig Tod Trebilcock, Esq.

A copy of this filing with the original sealed items was sent the same date only to the Court as follows:

Chambers of Honorable Richard D. Bennett
U.S. Courthouse - Chambers 5D
101 W. Lombard Street
Baltimore, MD 21201

/s/ Jonathan L. Katz _____
Jonathan L. Katz