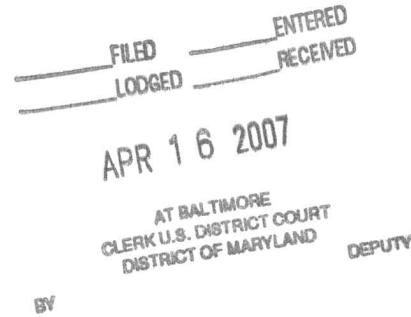


Rebekah A. Phelps-Davis
Pro Se Defendant
1216 Cambridge
Topeka, KS 66604
785.845.5938
785.233.0766 - fax

&

Shirley L. Phelps-Roper
Pro Se Defendant
3640 Churchill Road
Topeka, KS 66604
785.640.6334
785.233.0766 - fax
beshsncs@cox.net



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.

MOTION FOR STAY OF DISCOVERY

Rebekah A. Phelps-Davis and Shirley L. Phelps-Roper, as pro se defendants herein, hereby jointly move the Court for a stay of discovery in this matter, until such time as they complete and file, and the Court rules on, motions to dismiss and for other relief, including

motions pursuant to Rule 12(b)(6) and other appropriate legal theories, which will challenge the Complaint in this matter, including this Court's jurisdiction over these defendants and the subject matter of this case, and the failure of the Complaint to state a claim for relief.

A Memorandum of Support of Motion for Stay of Discovery is submitted herewith.

WHEREFORE, defendants Rebekah A. Phelps-Davis and Shirley L. Phelps-Roper request that the Court enter its order staying discovery in this matter, until the defendants file and the Court rules on motions to dismiss and for other relief pertaining to the Complaint herein.

Respectfully submitted,



Rebekah A. Phelps-Davis
Pro Se Defendant
1216 Cambridge
Topeka, KS 66604
785.845.5938
785.233.0766 – fax
beshsnecs@cox.net

&



Shirley L. Phelps-Roper
Pro Se Defendant
3640 Churchill Road
Topeka, KS 66604
785.640.6334
785.233.0766 - fax
beshsnecs.@cox.net

CERTIFICATE OF SERVICE

We hereby certify that the foregoing Motion for Stay of Discovery was served on April 12, 2007, as follows:

Original + 2 copies, with 2-hole punch, by regular mail, with return envelope, to:
U S District Court Clerk
101 W. Lombard Street, 4th Floor
Baltimore, MD 21201

Copy to:
Mr. Sean Summer, Esq.
.pdf copy by e-mail to ssummers@barley.com
Mr. Craig Trebilcock, Esq.
.pdf copy by e-mail to trebilcock@shumarkerwilliams.com
Mr. Jon Katz, Esq.
.pdf copy by e-mail to jon@markskatz.com

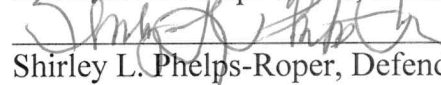
Copy by regular mail to:
Mr. Sean E. Summers, Esq.
Mr. Paul W. Minnich, Esq.
Mr. Rees Griffiths, Esq.
Barley Snyder LLC
100 E Market St
PO Box 15012
York, PA 17401

Mr. Craig Tod Trebilcock, Esq.
Shumaker Williams PC
135 N George St Ste 201
York PA 17401

Mr. Jonathan L. Katz, Esq.
1400 Spring St., Suite 410
Silver Spring, MD 20910



Rebekah A. Phelps-Davis, Defendant Pro Se



Shirley L. Phelps-Roper, Defendant Pro Se