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GARY LEE JONES, SR.
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7 **IN THE UNITED STATES DISTRICT COURT**
8 **DISTRICT OF NEVADA**

9 DA-DAZE-NOM MANZANARES)
10)
Plaintiff,)
11)
vs.)
12)
ELKO COUNTY SCHOOL DISTRICT; GARY)
13 LEE JONES, SR., as agent for ELKO)
COUNTY SCHOOL DISTRICT; GARY LEE)
14 JONES, SR., individually; CORPORATION OF)
THE PRESIDING BISHOP OF THE CHURCH)
15 OF JESUS CHRIST OF LATTER-DAY SAINTS,)
a foreign corporation registered to do business in)
16 the State of Nevada; CORPORATION OF THE)
PRESIDENT OF THE CHURCH OF JESUS)
17 CHRIST OF LATTER-DAY SAINTS AND)
SUCCESSORS, a foreign corporation registered to)
18 do business in the Sate of Nevada; and Does 1-5,)
and XYZ Corporations 1-5,)
19)
Defendants.)
20)

Case No. 3:07-CV-00076-LRH-RAM
**OPPOSITION TO PLAINTIFF'S MOTION
TO AMEND FIRST AMENDED COMPLAINT
AND DEMAND FOR JURY TRIAL**

21 COMES NOW, defendant GARY LEE JONES, SR., by and through counsel of record Kelly G.
22 Watson, Esq. and Aziz N. Merchant, Esq. of WATSON ROUNDS, and hereby submits this
23 **OPPOSITION TO PLAINTIFF'S MOTION TO AMEND FIRST AMENDED COMPLAINT AND**
24 **DEMAND FOR JURY TRIAL.** This opposition motion is based upon 11 U.S.C. §362, all pleadings,
25 papers and exhibits on file herein, and the points and authorities filed contemporaneously herewith.

MEMORANDUM OF POINTS AND AUTHORITIES

On August 30, 2007 the Plaintiff DA-DAZE-NOM MANZANARES filed a motion to amend her First Amended Complaint. Dk# 34. On September 6th, 2007 Defendant GARY L. JONES, SR. filed a motion to suggest a stay in the instant proceedings pursuant to 11 U.S.C. § 362. Dk# 41.

11 U.S.C. §362 provides in pertinent part:

(a) Except as provided in subsection (b) of this section, a petition filed under section 301, 302, or 303 of this title ... operates as a stay, applicable to all entities, of--

(1) the commencement or continuation, including the issuance or employment of process, of a judicial, administrative, or other action or proceeding against the debtor that was or could have been commenced before the commencement of the case under this title...

By operation of Federal Law, all proceedings must be stayed in this matter pending further order from the Bankruptcy Court.

Wherefore, Defendant GARY L. JONES, SR. will respond to Plaintiff's MOTION TO AMEND FIRST AMENDED COMPLAINT AND DEMAND FOR JURY TRIAL if and when the Bankruptcy Court lifts the automatic stay.

Dated: September 10, 2007

WATSON ROUNDS

By: Aziz N. Merchant
Kelly G. Watson, Esq.
Aziz N. Merchant, Esq.
Attorneys for Defendant
GARY LEE JONES SR.

CERTIFICATE OF SERVICE

Pursuant to Fed. R. Civ. P. 5(b), I certify that I am an employee of the law offices of WATSON ROUNDS, and that on this date, the following individuals were served via United States Post Office with and **OPPOSITION TO PLAINTIFF'S MOTION TO AMEND FIRST AMENDED COMPLAINT AND DEMAND FOR JURY TRIAL** addressed as follows

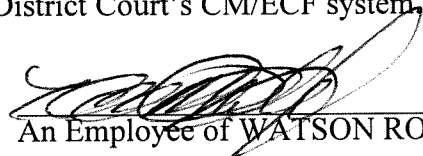
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Pursuant to Fed. R. Civ. P. 5(b), I certify that I am an employee of the law offices of WATSON ROUNDS, and that on this date, the following individuals were electronically served with _____ via the United States District Court's CM/ECF system.

Dated: September 10, 2007


An Employee of WATSON ROUNDS

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