

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK

PAUL D. CEGLIA,

Plaintiff,

v.

MARK ELLIOT ZUCKERBERG and
FACEBOOK, INC.,

Defendants.

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**NOTICE OF MOTION TO
STAY DISCOVERY PENDING
A RULING ON DEFENDANTS'
DISPOSITIVE MOTIONS**

Civil Action No. 1:10-cv-00569-
RJA

PLEASE TAKE NOTICE that upon the accompanying Memorandum of Law and Declaration of Alexander H. Southwell, Esq., with accompanying exhibits, the undersigned move this Court to stay discovery in this matter until this Court resolves Defendants' dispositive motions and defer the setting of a discovery schedule, and for an order:

- (1) Staying discovery pending a ruling on Defendants' dispositive motions; and
- (2) Deferring the setting of a discovery schedule pending a ruling on Defendants'

dispositive motions and further proceedings.

PLEASE TAKE FURTHER NOTICE that, pursuant to Local Civil Rule of Procedure 7.1(d) of this Court, Defendants seek an expedited hearing and briefing schedule on this motion. Defendants respectfully request that, in the interest of judicial economy, the Court should hear this motion during the previously scheduled April 4, 2012 hearing. Specifically, Defendants request that Ceglia should be ordered to file any brief in opposition to this motion on or before April 1, 2012, and Defendants should be ordered to file any reply memorandum in support of this motion on or before April 3, 2012.

PLEASE TAKE FURTHER NOTICE that, pursuant to Local Civil Rule of Procedure 7 of this Court, Defendants request oral argument and state their intention to file and serve reply papers.

Dated: New York, New York
March 26, 2012

Respectfully submitted,

/s/ Orin Snyder

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