

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TENNESSEE
KNOXVILLE DIVISION**

LINCOLN MEMORIAL UNIVERSITY)	
DUNCAN SCHOOL OF LAW,)	
)	Case No. 3:11-CV-608
Plaintiff,)	Hon. Thomas A. Varlan
)	Magistrate Judge C. Clifford Shirley
v.)	
)	
THE AMERICAN BAR ASSOCIATION,)	
)	
Defendant.)	
)	

DEFENDANT AMERICAN BAR ASSOCIATION’S MOTION TO STAY

Defendant American Bar Association (“ABA”), by its counsel, respectfully moves this Honorable Court for a stay of the litigation in the above-captioned matter. A stay is appropriate because plaintiff Lincoln Memorial University Duncan School of Law (“the School”) has filed an appeal to the Appeals Panel of the December 2011 decision of the Council of the Section of Legal Education and Admissions to the Bar denying provisional accreditation to the School, which appeal was publicly announced on or about January 19, 2012. A stay will allow the School properly to exhaust its administrative remedies. It will also allow the Appeals Panel a full opportunity to consider the School’s claims, avoid premature interference with its processes and provide a complete administrative record for judicial review. In support of this Motion, the ABA submits the attached Memorandum.

Dated: February 8, 2012

Respectfully submitted,

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CERTIFICATE OF SERVICE

I certify that on February 8, 2012, I properly served all parties with Defendant American Bar Association's Motion to Stay by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt and U.S. Mail.

By: s/ Howard H. Vogel (0001015)