

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

GOOSEBERRY NATURAL RESOURCES,  
LLC,

Plaintiff,

v.

CONDESA, INC.,  
MASS MEDIA DISTRIBUTION, LLC  
MEK ENTERPRISES d/b/a  
ERELEASES.COM,  
PROVEN WAYS, INC.,  
PR WORLDWIDE, INC., and  
RV MEDIA, LLC d/b/a PR 18 NETWORK,

Defendants.

Civil Action No. 2:10-CV-210-TJW

**JURY TRIAL DEMANDED**

**MOTION TO STAY**

Plaintiff Gooseberry Natural Resources and Defendant Mass Media Distribution, LLC (collectively, “the Parties”) hereby respectfully notify the Court that the parties have reached an agreement to settle this case subject to the execution of a written settlement and license agreement acceptable to both parties. As a result, the parties respectfully request that all activities as to Mass Media Distribution, LLC be stayed effective today pending execution of a formal written settlement and license agreement.

The parties further agree that such formal settlement agreement shall be executed and a stipulation of dismissal of all claims in this action, pursuant to Rule 41 of the Federal Rules of Civil Procedure, will be filed within 15 days.

Wherefore, the Parties respectfully pray that the Court grant this Motion to Stay.

DATED: February 14, 2011

Respectfully submitted,

/s/Melissa Richards Smith

Melissa Richards Smith

Texas State Bar No. 24001351

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**ATTORNEY FOR PLAINTIFF**

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that the foregoing document was filed electronically in compliance with Local Rule CV-5(a). As such, this document was served on all counsel who have consented to electronic service. Local Rule CV-5(a)(3)(A). Pursuant to Fed. R. Civ. P. 5(d) and Local Rule CV-5(e), all other counsel of record not deemed to have consented to electronic service were served with a true and correct copy of the foregoing by U.S. mail or facsimile transmission, on this the 14th day of February, 2011.

/s/Melissa Richards Smith

Melissa Richards Smith