

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

Floyd E. Ivey
Liebler, Ivey, Connor, Berry & St. Hilaire
1141 N. Edison, Suite C
P.O. Box 6125
Kennewick, WA 99336
Telephone (509) 735-3581
Fax (509) 735-3585
Attorneys for Defendant

Hon. Judge T. S. Zilly

DOUGLAS E. MCKINLEY, JR.
Attorney At Law
P.O. Box 202 Richland, Washington 99352
509-628-0809
Fax (509) 628-2307
Attorney for Plaintiff

ROBERT J. SIEGEL
1325 4th Ave Ste 940
Seattle, WA
98101-2509

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON**

OMNI INNOVATIONS LLC et al

Plaintiffs

ASCENTIVE, LLC
a Delaware Limited Liability Company,

Defendant

NO. CV-06-01284-TSZ

DEFENDANT’S PETITION
FOR STAY PENDING
RECONSIDERATION OF
ORDER DISQUALIFYING
COUNSEL FLOYD E. IVEY
OR UNTIL WRIT OF
MANDAMUS FILED

Defendants now Petition for A Stay of the Order disqualifying Counsel Ivey of November 29, 2006 and the Court’s Minute Order of December 1, 2006 pending hearing of Defendants’ Motion for Reconsideration of the Court’s November 29, 2006 Order disqualifying Counsel Floyd E. Ivey. This Motion is brought pursuant to Local rule 7(d)(2)(A) re: seeking relief from a deadline or limit. This motion supported by Defendants’ Memorandum supporting Petition for Stay and the Declaration of Floyd E. Ivey in Support of Petition for Stay.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

DATED this 12st day of December, 2006.

LIEBLER, IVEY, CONNOR, BERRY & ST. HILAIRE

s/ FLOYD E. IVEY

Floyd E. Ivey, WSBA #6888
Attorneys for the Defendants Ascentive and Schran

I hereby certify that on December 12, 2006, I electronically filed **Defendant's Motion for Stay** with the Clerk of the Court using the CM/ECF System which will send notification of such filing to Robert Siegel and Douglas McKinley. I hereby certify that I have served the foregoing to the following non-CM/ECF participants by other means: NA.

S/ FLOYD E. IVEY

FLOYD E. IVEY