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UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON, SEATTLE

**OMNI INNOVATIONS, LLC, a  
Washington Limited Liability  
company,**

**NO. 06-1469**

**MOTION FOR A STAY**

**Plaintiff,**

v.

**NOTE FOR HEARING:  
SEPT. 14, 2007**

**IMPULSE MARKETING GROUP,  
INC, a Nevada/Georgia corporation;  
JEFFREY GOLDSTEIN, individually  
and as part of his marital community;  
KENNETH ADAMSON, individually  
and as part of his marital community;  
GREGORY GREENSTEIN,  
individually and as part of his marital  
community; STEVE WADLEY,  
individually and as part of his marital  
community; JOHN DOES, I-X,**

**Defendants,**

Plaintiff, by and through undersigned counsel, hereby moves the Court for an order staying this litigation pending Plaintiffs' appeal to the US Circuit Court of Appeals For the Ninth Circuit in *Gordon v Virtumundo, et al.*, CV06-0204.

Plaintiffs have filed an appeal to the US Court of Appeals for the Ninth Circuit in

MOTION FOR A STAY -1

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1 *Virtumundo*. Although some of the factual issues in the present case differ from those in  
2 *Virtumundo*, the fundamental issue of Plaintiffs' standing is common, and critical to both cases.

3 Additionally, Plaintiff's counsel has filed a motion to withdraw, and a stay would serve to  
4 protect Plaintiff's rights pending the *Virtumundo* appeal, and provide Plaintiff adequate time  
5 within which to secure substitute counsel.

6 Accordingly, there is good cause to stay this litigation to preserve judicial economy as  
7 well as the resources of the parties hereto.

8 **RESPECTFULLY SUBMITTED** this 27<sup>th</sup> day of August, 2007.

9  
10 DOUGLAS E. MCKINLEY, JR.  
11 Attorney at Law

i. Justice Law, P.C.

12 /S/ Douglas E. McKinley, Jr.  
13 Douglas E. McKinley, Jr., WSBA #20806  
Attorney for Plaintiffs

/S/ Robert J. Siegel  
Robert J. Siegel, WSBA #17312  
Attorney for Plaintiffs

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**Certificate of Service**

I, hereby, certify that on August 27, 2007, I filed the attached pleading with this Court via approved electronic filing, which will serve all counsel for defendants.

**i.Justice Law, PC**  
1325 Fourth Ave., Suite 940  
Seattle, WA 98101  
/s/ Robert J. Siegel  
Attorneys for Plaintiffs.