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*Larry Heller*  
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IN THE COURT OF COMMON PLEAS OF ADAMS COUNTY OHIO  
CIVIL DIVISION

**SHAWN D. COOLEY, et al.,**

Plaintiffs,

vs.

**JOSEPH EDGAR FOREMAN,  
A/K/A AFROMAN, et al.,**

Defendants.

: Case No. 2023-0069

: Judge Jerry McBride

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**JOINT STIPULATION OF PLAINTIFFS AND DEFENDANTS TO STAY DISCOVERY  
AS TO DEFENDANTS' COUNTERCLAIMS**

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Plaintiffs, Shawn D. Cooley, Justin Cooley, Michael D. Estep, Shawn S. Grooms, Brian Newland, Lisa Phillips, and Randolph L. Walters, Jr. ("Plaintiffs"), and Defendants, Joseph Foreman and Hungry Hustler Records, by and through their respective counsel, hereby stipulate to a stay of discovery as to Defendants' counterclaims pending the resolution of the immunity arguments set forth in Plaintiff's pending Motion for Judgment on the Pleadings.

On May 30, 2024, Plaintiffs filed a Motion for Judgment on the Pleadings as to Defendants' Counterclaims, raising numerous arguments in favor of dismissal including statutory, qualified, absolute, and quasi-judicial immunity. Plaintiffs also filed a Motion to Stay Discovery as to the Counterclaims against them on May 30, 2024. Defendants intend to oppose Plaintiffs' Motion for Judgment on the Pleadings, but in the meantime, consent to the requested stay of discovery as to the Counterclaims. The parties will continue to conduct discovery as to Plaintiff's claims against Defendants, and Defendants' defenses to Plaintiff's claims. Both parties aver this request is not to

delay litigation or waste resources. Rather, this joint stay is in the interest of both parties and the Court to minimize unnecessary time and legal resources.

Accordingly, Plaintiffs and Defendants jointly stipulate to a stay of discovery as to Defendants' Counterclaims until the immunity arguments raised in the Motion for Judgment on the Pleadings are determined.

Respectfully submitted,

/s/ David Moser

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**CERTIFICATE OF SERVICE**

This certifies that a true and accurate copy of the foregoing was served by email, this 20th day of June 2024, upon the following:

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