

COURT OF COMMON PLEAS  
CIVIL DIVISION  
ADAMS COUNTY, OHIO

FILED  
ADAMS COUNTY  
CLERK OF COURTS  
2024 JUN 18 AM 10:19

SHAWN COOLEY et al

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CASE NO. CVH 20230069

*Larry Heller*  
CLERK

PLAINTIFFS,

VS.

Judge Jerry McBride

JOSEPH E. FOREMAN et al

DEFENDANTS.

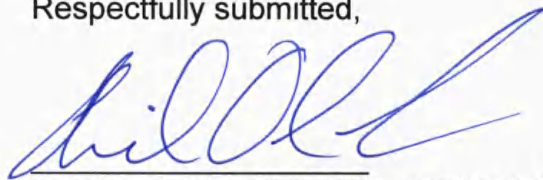
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**DEFENDANT'S JOESPH E. FOREMAN AND HUNGRY HUSTLER RECORDS  
RESPONSE TO PLAINTIFFS' MOTION TO STAY DISCOVERY**

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Comes now Defendants, Joseph E. Foreman and Hungry Husler Records, gives notice to the court that the Defendants consents to a stay of all counterclaim discovery until the Plaintiffs' Motion for Judgment on the Pleadings as to the Defendants' Counterclaims is ruled upon following an oral hearing.

Respectfully submitted,



DAVID "D.J." OSBORNE, JR #0096879  
Attorney for the Defendant's Joesph E.  
Forman and Hungry Hustler Records

**PROOF OF SERVICE**

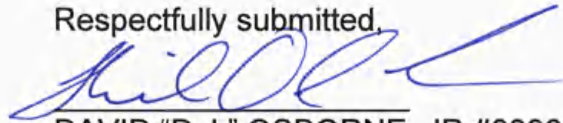
The undersigned hereby certifies that a true copy of the foregoing was served upon to following:

1. **Robert A. Klinger**, Robert A. Klinger Co., LPA, 895 Central Ave. Ste. 300, Cincinnati, Ohio 45202;

2. **David Moser**, Fishel Downey Albrecht and Riepenhoff, LLP, 7775 Walton Parkway, Suite 200, New Albany, Ohio 43054.
3. **Helen K. Sudhoff**, Fishel Downey Albrecht and Riepenhoff, LLP, 7775 Walton Parkway, Suite 200, New Albany, Ohio 43054.

by regular U.S. mail, hand delivery, **email**, fax, by dropping off in the Attorney box at Adams County Court, or email this   18   day of   June  , 2024.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "David D.J. Osborne, Jr.", written over a horizontal line.

DAVID "D.J." OSBORNE, JR #0096879  
Attorney for Defendants Joseph E.  
Foreman and Hungry Hustler Records  
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