

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF OHIO  
WESTERN DIVISION

\_\_\_\_\_  
Plaintiff,  
vs.  
\_\_\_\_\_  
Defendant.

:  
:  
: Case No. \_\_\_\_\_  
: JUDGE \_\_\_\_\_  
: MAGISTRATE JUDGE \_\_\_\_\_

**JOINT MOTION TO: (1) STAY THIS CASE FOR \_\_\_\_ DAYS PENDING  
THE PARTIES' COLLABORATIVE EFFORTS TO SETTLE WITHOUT  
FURTHER LITIGATION; AND (2) DENY ALL PENDING MOTIONS AS  
MOOT WITHOUT PREJUDICE TO REILING**

The parties to this civil case and their counsel have voluntarily committed themselves to pursuing a resolution of this dispute, by settlement and with no further litigation, using the collaborative negotiation techniques developed by the Cincinnati-based Collaborative Law Center. Accordingly, the parties jointly move for a \_\_\_\_-day stay of this case, during which time settlement will be attempted in good faith. The parties further move to have the Court deny all pending motions as moot, and without prejudice to the parties' right to refile said motions within fifteen days of the termination of the stay, in the event settlement fails. The

requested stay, and motions denial, are both supported by the reasons expressed in the attached memorandum.

Respectfully submitted,

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