

IN THE _____ COURT OF _____ COUNTY,

_____,
Plaintiff,

v. Case No. _____

_____,
Defendant.
_____ /

MOTION TO STAY PROCEEDINGS

Plaintiff/Defendant, _____, by and through undersigned counsel, or appearing pro se, hereby moves this Honorable Court for an Order staying all proceedings in the above-captioned matter pending the outcome of a related matter or appeal, and in support thereof states as follows:

I. PROCEDURAL POSTURE

1. This action was commenced on _____. The parties are currently engaged in _____.
2. There is a related matter, Case No. _____, currently pending before _____, or an appeal of a related judgment is pending before _____.
3. The related matter/appeal involves _____, which directly impacts

the issues and potential resolution of the instant case.

II. GROUNDS FOR MOTION

4. A stay of proceedings in this case is warranted to prevent unnecessary litigation, conserve judicial resources, and avoid the risk of inconsistent judgments.
5. The outcome of the related matter/appeal is dispositive of, or highly relevant to, one or more central issues in the present action. Proceeding with discovery, motion practice, or trial in this case before the resolution of the related matter/appeal would result in a duplication of effort and significant, avoidable costs for the parties and the Court.
6. Should the related matter/appeal be resolved in a particular way, it could simplify, narrow, or even render moot certain claims or defenses currently at issue in this case.
7. Granting a stay will promote judicial economy by allowing the Court and the parties to await a controlling determination on issues that are common to both proceedings.
8. The Movant will suffer prejudice if this action proceeds while the related matter/appeal is pending, including but not limited to _____.
9. A stay will not unduly prejudice the opposing party. Any potential prejudice to the opposing party is outweighed by the benefits of judicial economy and the avoidance of unnecessary litigation.

III. RELIEF REQUESTED

WHEREFORE, Plaintiff/Defendant, _____, respectfully requests that this Honorable Court enter an Order:

- a. Staying all proceedings in the above-captioned matter, including discovery, motion practice, and trial, until the final resolution of _____, Case No. _____, including any appeals therefrom; and
- b. Granting such other and further relief as this Court deems just and proper.

Dated this _____ day of _____, 20_____.

Respectfully submitted,

Signature

Printed Name: _____

Bar No.: _____

Attorney for Plaintiff/Defendant Address:

Phone:

Email:

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing MOTION TO STAY PROCEEDINGS was served upon the following parties by _____ on this _____ day of _____, 20____ :

Recipient: _____

Address:

Method of Service: _____

Recipient: _____

Address: _____

Method of Service: _____

Signature