

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

Martin Cowen, et al.,

Plaintiffs,

vs.

Brad Raffensperger, in his
official capacity as Secretary of
State of the State of Georgia,

Defendant.

Case No. 1:17-cv-04660-LMM

**Plaintiffs' Unopposed
Motion for a Stay**

The plaintiffs respectfully move the Court for an order staying further proceedings in this case pending the filing of a petition for a writ of certiorari and, if one is timely filed, pending the Supreme Court's final disposition of that petition. The defendant does not oppose this motion.

On April 12, 2022, this Court entered a scheduling order for resolving the plaintiffs' remaining claim in this case in the months ahead. (ECF 196.) The plaintiffs, however, intend to file a petition for a writ of certiorari asking the Supreme Court to review the Eleventh

Circuit's most recent decision in this case (ECF 190). If granted, that petition could once again render the remaining claim moot.

In order to minimize the unnecessary expenditure of judicial and litigant resource on a potentially moot claim, the plaintiffs believe that a stay pending disposition of their petition would be appropriate here. Such a stay would cause no prejudice to either party, as the possibility of obtaining relief in the current election cycle has passed. If the Supreme Court denies the plaintiffs' petition, this Court would still have plenty of time to resolve the remaining claim before the next election cycle.

In addition, counsel for both sides in this case have other time-sensitive election-related matters that are scheduled for trial or briefing this summer. The stay would ensure that, if briefing on the plaintiffs' remaining claim becomes necessary, the parties would have sufficient time to brief the matter clearly for the Court's benefit.

Respectfully submitted this 21st day of April, 2022.

/s/ Bryan L. Sells

Georgia Bar No. 635562
Attorney for the Plaintiffs
The Law Office of Bryan L. Sells, LLC
PO Box 5493
Atlanta, Georgia 31107-0493
Telephone: (404) 480-4212
Email: bryan@bryansellslaw.com

Certificate of Compliance

I hereby certify that the forgoing document was prepared in 13-point Century Schoolbook in compliance with Local Rules 5.1(C) and 7.1(D).

/s/ Bryan L. Sells

Georgia Bar No. 635562
Attorney for the Plaintiffs
The Law Office of Bryan L. Sells, LLC
PO Box 5493
Atlanta, Georgia 31107-0493
Telephone: (404) 480-4212
Email: bryan@bryansellslaw.com