

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA**

AMY BRYANT, M.D., M.S.C.R.; BEVERLY)	CIVIL ACTION
GRAY, M.D.; ELIZABETH DEANS, M.D., on)	
behalf of themselves and their patients seeking)	Case No. 1:16-CV-01368
abortions; and PLANNED PARENTHOOD)	
SOUTH ATLANTIC, on behalf of itself, its staff,)	
and its patients seeking abortions,)	
)	
Plaintiffs,)	
)	
v.)	
)	
JIM WOODALL, in his official capacity as)	
District Attorney (“DA”) for Prosecutorial)	
District (“PD”) 15B; ROGER ECHOLS, in his)	
official capacity as DA for PD 14; ELEANOR E.)	
GREENE, M.D., M.P.H, in her official capacity)	
as President of the North Carolina Medical)	
Board; RICK BRAJER, in his official capacity as)	
Secretary of the North Carolina Department of)	
Health and Human Services; and their)	
employees, agents, and successors,)	
)	
Defendants.)	

STIPULATED MOTION TO STAY

Plaintiffs, Amy Bryant, M.D., M.S.C.R., Beverly Gray, M.D., Elizabeth Deans, M.D., and Planned Parenthood South Atlantic, and Defendants Jim Woodall, Roger Echols, Eleanor E. Greene, and Rick Brajer, in their official capacities (collectively the “Parties”), by and through their undersigned attorneys, file this joint motion for entry of a Stipulated Stay Order, staying all proceedings in this matter, including discovery. Pursuant to Federal Rule of Civil Procedure 72(a) and Standing Order 30, ¶ 6, Plaintiffs intend to

file an objection to the April 7, 2017 Memorandum Opinion and Order on or before April 21, 2017. In the interest of promoting efficiency and conserving resources, the parties agree to stay the discovery period pending review of the objection. The parties make this request under Local Rule 72.3. The parties agree that should the District Court uphold the April 7, 2017 Memorandum Opinion and Order, a 60 day discovery period will commence beginning on the day of the District Court's Order, followed by an additional 30 days for Defendants to file a Response to Plaintiffs' Motion for Summary Judgment.

WHEREFORE, the Parties respectfully request the Court to enter a Stipulated Stay Order staying all proceedings in this matter, including all discovery, pending review of the objection.

Dated: April 18, 2017

RESPECTFULLY SUBMITTED,

/s/ I. Faison Hicks

I. Faison Hicks
North Carolina State Bar Number 10672
Attorney for the Defendants

Special Deputy Attorney General
North Carolina Department of Justice
114 West Edenton Street
Office Number 349
Raleigh, North Carolina 27603
Post Office Box 629
Raleigh, North Carolina 27602-0629
Telephone Number: 919/716-6629
Cellular Telephone Number: 704/277-8635
Facsimile Number: 919/716-6763
Email Address: fhicks@ncdoj.gov

/s/ Genevieve Scott

Christopher Brook, NC Bar #33838
ACLU of North Carolina
P. O. Box 28004
Raleigh, NC 27611-8004
(919) 834-3466
cbrook@acluofnc.org
COUNSEL FOR PLAINTIFFS

Genevieve Scott*
Julie Rikelman*
Center for Reproductive Rights
199 Water Street, 22nd Fl.
New York, NY 10038
(917) 637-3605
(917) 637-3666 Fax
gscott@reprorights.org
jrikelman@reprorights.org
COUNSEL FOR AMY BRYANT, M.D., M.S.C.R.

Andrew Beck*
American Civil Liberties Union Foundation
125 Broad Street, 18th Fl.
New York, NY 10004
(212) 549-2633
abeck@aclu.org
COUNSEL FOR BEVERLY GRAY, M.D., AND ELIZABETH DEANS, M.D.

Carrie Y. Flaxman*
Planned Parenthood Federation of America
1110 Vermont Avenue, NW, Suite 300
Washington, D.C. 20005
(202) 973-4830
carrie.flaxman@ppfa.org

Maithreyi Ratakonda*
Planned Parenthood Federation of America
123 William Street, 9th Fl.
New York, NY 10038
(212) 261-4405

mai.ratakonda@ppfa.org

COUNSEL FOR PLANNED PARENTHOOD SOUTH ATLANTIC

*By Special Appearance

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)	
Defendants.)	

PROPOSED ORDER ON STIPULATED MOTION TO STAY

The Parties’ Stipulated Motion to Stay is GRANTED.

SO ORDERED this the ____ day of _____, 2017.

L. Patrick Auld
UNITED STATES MAGISTRATE JUDGE