

Rebecca J. Walden
CLERK SUPERIOR COURT

IN THE SUPERIOR COURT OF GLYNN COUNTY
STATE OF GEORGIA

THE CITY OF BRUNSWICK, GEORGIA,

Plaintiff,

v.

**SOUTHEASTERN EDUCATIONAL
SERVICES, INC.,**

Defendant.

Case No. CE23-00918

PLAINTIFF'S MOTION TO STAY PROCEEDINGS

COMES NOW, Plaintiff City of Brunswick, Georgia, (hereinafter the "Plaintiff" or "City"), and files this Motion to Stay Proceedings, and respectfully shows the Court as follows:

1. Plaintiff filed this matter on July 21, 2023, seeking, among other things, a temporary restraining order to abate nuisance conditions on Defendant's property and other injunctive relief against Defendant.
2. This Court scheduled a hearing on the Plaintiff's request for the Temporary Restraining Order to be held on October 13, 2023.
3. On September 29, 2023, the Plaintiff received a request from the United States Department of Justice (the "Department") to stay the proceedings in the present matter to allow for the Department to obtain information from the City.
4. The City notified the Department it would file a motion to stay proceedings and respond to the Department's request for information.
5. Plaintiff notified Defendant's counsel of the intent to file the Motion to Stay. Defense counsel agreed to the filing of the Motion to Stay.

6. Plaintiff, having filed this Motion to Stay Proceedings, respectfully requests this Court enter an Order staying all proceedings in this matter.

Respectfully submitted, this 10th day of October, 2023.

MCQUIGG, SMITH & CORRY, LLC

/s/ Brian D. Corry

Brian D. Corry

Georgia Bar No. 165557

Attorney for Plaintiff

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CERTIFICATE OF SERVICE

This is to certify that I have this day served all parties with a copy of the foregoing pleading, by electronic service through online filing to:

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Douglas W. Alexander
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This the 10th day of October, 2023.

MCQUIGG, SMITH & CORRY, LLC

/s/ Brian D. Corry
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