

Plaintiff's objection—which appears to challenge the Court's jurisdiction to enter the stay—is meritless. There can be no question jurisdiction lies here (if there is a case at all). The lengthy recitations of case law concerning appellate jurisdiction in another suit are misguided and have no bearing on the stay of discovery. Plaintiff's other arguments are likewise baseless.

For these reasons, defendants request that the District Court uphold the Magistrate's ruling to stay discovery; grant defendants' Motion to Dismiss; and enter an injunction against Mr. Lipari from instituting any further actions on behalf of himself or his company based upon these same or similar underlying facts and claims without first showing cause to the Court as to the validity of such cause of action. Defendants also request any other relief to which they are justly entitled.

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ATTORNEYS FOR DEFENDANTS

CERTIFICATE OF SERVICE

I hereby certify that a copy of the above and foregoing was served via United States mail, postage prepaid, on this 8th day of June, 2007 to:

Mr. Samuel K. Lipari
297 NE Bayview
Lee's Summit, MO 64064
Plaintiff

/s/ Mark A. Olthoff

Attorney for Defendants