

NORTH CAROLINA
GUILFORD COUNTY

IN THE GENERAL COURT OF JUSTICE
SUPERIOR COURT DIVISION
15 CVS 2791

LEONARD COLDWELL,)
)
 Plaintiff,)
)
 vs.)
)
 CONNIE SCHMIDT, TRENT)
 TOULOUSE,)
 RATIONALWIKI.COM,)
 SALTYDROID.COM,)
 JASON MICHAEL JONES,)
 WHOIS.COM,)
)
 Defendants.)

**DEFENDANT CONNIE SCHMIDT'S
MOTION TO STAY DISCOVERY
PENDING RESOLUTION OF
MOTION TO DISMISS FOR LACK OF
PERSONAL JURISDICTION**

Defendant Connie Schmidt, *pro se*, pursuant to Rule 26(c) of the North Carolina Rules of Civil Procedure, moves this Court for a protective order staying all discovery not directly related to issues of personal jurisdiction, until such time as this Court has ruled on Defendant Schmidt's Motion to Dismiss for Lack of Personal Jurisdiction (filed in the Court on 27 February, 2015).

"A protective order under Rule 26(c) to stay discovery pending determination of a dispositive motion is an appropriate exercise of the court's discretion." *Tilley v. United States*, 270 F. Supp. 2d 731, 734 (M.D.N.C 2003).

Respectfully submitted this 9th day of April 2015.

By: _____

Connie L. Schmidt



CERTIFICATE OF SERVICE

The undersigned hereby certifies that true and correct copies of this Motion to Stay Discovery Pending Resolution of Motion to Dismiss Plaintiff's Complaint for Lack of Personal Jurisdiction have been served upon:

William F. May, Attorney at Law
Culbertson & Associates
315-F Spring Garden Street
Greensboro, NC 27401

Jason M. Jones
1147 Hunter Avenue
Columbus, OH 43201

by enclosing them into a properly addressed envelope, first class postage prepaid, and depositing the envelope in the United States Mail in Waller, Texas, on the 9th Day of April, 2015.