

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

**GERALD LYNN BOSTOCK,** )

**Plaintiff,** )

**v.** )

**CLAYTON COUNTY,** )

**Defendant.** )

**CIVIL ACTION  
NO: 1:16-cv-01460-ELR**

**CONSENT MOTION TO STAY PENDING MEDIATION**

COME NOW the parties and jointly move the Court to enter an order staying all deadlines in this matter, including the deadline for filing objections to the magistrate judge’s final report and recommendation, pending the outcome of the parties’ forthcoming mediation.

The parties have agreed to mediate this matter with Henning Mediation & Arbitration and intend to schedule this mediation to occur in September or early October 2022. The parties intend to use the requested stay to prepare for and participate in this mediation to further the goal of resolving this matter without the need for further litigation. If this stay is granted, the parties will notify the Court within five business days after the mediation as to whether or not the mediation was successful.

The parties further request that the Court's order provide that, in the event the mediation is unsuccessful, the parties' deadline for filing objections to the magistrate judge's final report and recommendation (Doc. 166) be extended to ten days after the date of the mediation, with all other deadlines to be extended accordingly.

Therefore, the parties respectfully request that this Court stay all deadlines in this case so that they may mediate their dispute. A proposed order is attached for the Court's convenience.

Respectfully submitted, this 4th day of August, 2022.

*CONSENTED TO BY:*

/s/ Edward D. Buckley

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*Counsel for Defendant*

**CERTIFICATE OF COMPLIANCE**

I hereby certify that the within and foregoing **CONSENT MOTION TO STAY PENDING MEDIATION** has been prepared in compliance with Local Rule 5.1(B) in 14-point Times New Roman type face.

This 4th day of August, 2022.

*/s/ Jack R. Hancock* \_\_\_\_\_

Jack R. Hancock

Georgia Bar No. 322450

**CERTIFICATE OF SERVICE**

I hereby certify that I served the attached notice and subpoena on the witness or his/her agent and have electronically filed the foregoing **CONSENT MOTION TO STAY PENDING MEDIATION** with the Clerk of Court using the CM/ECF system, which will send notification of such filing to the following attorneys of record:

Edward D. Buckley  
Thomas J. Mew, IV  
Andrew Beal  
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600 Peachtree Street, NE, Suite 3900  
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This 4th day of August, 2022.

**FREEMAN MATHIS & GARY, LLP**

*/s/ Jack R. Hancock* \_\_\_\_\_

Jack R. Hancock

Georgia Bar No. 322450

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**ORDER**

This matter is before the Court on the parties’ Consent Motion to Stay Pending Mediation. Upon consideration, and for good cause shown, the parties’ Consent Motion is **GRANTED**. This case hereby is **STAYED** pending the parties’ mediation of this matter. The parties are **DIRECTED** to notify the Court within five (5) business days after the mediation as to whether the mediation was successful. If the parties notify the Court that the mediation was not successful, the deadline for filing objections to the magistrate judge’s final report and recommendation (Doc. 166) shall be extended to ten (10) days after the date of the mediation, with all other deadlines to be extended accordingly.

**SO ORDERED**, this \_\_\_\_ day of August, 2022.

\_\_\_\_\_  
HONORABLE ELEANOR L. ROSS  
UNITED STATES DISTRICT JUDGE