

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION**

BONGO PRODUCTIONS, LLC, and ROBERT	)	
BERNSTEIN,	)	
	)	
Plaintiffs,	)	
	)	
v.	)	Civ. Action
	)	Case No. 3:21-cv-00490
	)	Judge Trauger
CARTER LAWRENCE, Tennessee State Fire	)	
Marshal, in his official capacity, et al.,	)	
	)	
Defendants.	)	

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**JOINT MOTION TO STAY  
DEADLINE FOR MOTION FOR ATTORNEYS' FEES AND COSTS**

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Counsel for Plaintiffs and Counsel for Defendants jointly request a stay of the deadline to submit a bill of costs to the Court for attorney's fees and costs of litigation. Counsel note that this motion is made within 30 days from the entry of judgment. *See* Local Rule 54.01(b)(1).

Pursuant to Local Rule 54.01(a), Counsel for both parties anticipate reaching an agreement as to the payment of costs and fees. Counsel respectfully request an extension of 45 days from the entry of this Stay to allow parties to reach such an agreement.

While Counsel for both parties anticipate reaching an agreement, should they fail, Counsel for Plaintiffs will submit a Motion for Fees and Costs with this Court within 45 days from the entry of the Stay.

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

I hereby certify that on June 16, 2022, a true and correct copy of the foregoing motion was served on the Tennessee Attorney General's Office, counsel for all Defendants, via the Court's ECF/CM system.

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/s/ Stella Yarbrough  
Stella Yarbrough

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**[PROPOSED ORDER] STAYING  
DEADLINE FOR MOTION FOR ATTORNEYS' FEES AND COSTS**

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Upon consideration of Counsel for Plaintiffs' and Counsel for Defendants' Joint Motion to Stay Deadline For Motion For Attorneys' Fees and Costs (filed June 16, 2022), and in anticipation of Counsel for both Parties reaching an agreement as to fees and costs, this Court **GRANTS** the Joint Motion staying the deadline under Local Rule 54.01(b)(1) for 45 days from the entry of this Order.

Dated the \_\_\_ of June, 2022.

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ALETA A. TRAUGER  
United States District Judge