

SCOTT YOUNG (10695)
SNOW CHRISTENSEN & MARTINEAU
10 Exchange Place, 11th Floor
Salt Lake City, Utah 84111
Telephone: (801) 521-9000
rsy@scmlaw.com
Attorneys for Defendants

TANI PACK DOWNING (06122)
JAMI R. BRACKIN (08753)
RYAN N. DOOLEY (17009)
CITY OF ST. GEORGE
175 E. 200 N.
St. George, Utah 84765
tani.downing@sgcity.org
jami.brackin@sgcity.org
ryan.dooley@sgcity.org
Attorneys for Defendants

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF UTAH**

SOUTHERN UTAH DRAG STARS, LLC,
and MITSKI AVALOX,

Plaintiffs,

vs.

CITY OF ST. GEORGE, CITY COUNCIL OF
ST. GEORGE, COUNCILMEMBER JIMMIE
HUGHES, COUNCILMEMBER DANIELLE
LARKIN, COUNCILMEMBER NATALIE
LARSEN, COUNCILMEMBER GREGG
MCARTHUR, COUNCILMEMBER
MICHELLE TANNER, MAYOR MICHELE
RANDALL, and CITY MANAGER JOHN
WILLIS,

Defendants.

STIPULATED MOTION TO STAY

Civil No. 4:23CV44

Honorable David Nuffer

Plaintiffs Southern Utah Drag Stars, LLC and Mitski Avalox, and Defendants City of St. George, City Council of St. George, Councilmembers Jimmie Hughes, Danielle Larkin, Natalie Larsen, Gregg McArthur, and Michelle Tanner, Mayor Michelle Randall, and City Manager John

Willis, by and through counsel, hereby move the Court to stay this litigation. The purpose of the stay is to allow the parties to engage in mediation with the hope of resolving this dispute in its entirety. A proposed order to this effect is attached hereto as Exhibit A.

DATED this 3rd day of October, 2023.

AMERICAN CIVIL LIBERTIES UNION OF
UTAH

/s/ John Mejia (Signed with permission)_____

John Mejia
Attorney for Plaintiffs

DATED this 3rd day of October, 2023.

SNOW CHRISTENSEN & MARTINEAU

/s/ Scott Young_____

R. Scott Young
Attorneys for Defendants

CERTIFICATE OF SERVICE

I hereby certify that on the 3rd day of October, 2023, I electronically filed the foregoing **STIPULATED MOTION TO STAY** with the Clerk of the Court using the CM/ECF System, which will notify all counsel of record.

/s/ Annette Gamero

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF UTAH**

SOUTHERN UTAH DRAG STARS, LLC,
and MITSKI AVALOX,

Plaintiffs,

vs.

CITY OF ST. GEORGE, CITY COUNCIL OF
ST. GEORGE, COUNCILMEMBER JIMMIE
HUGHES, COUNCILMEMBER DANIELLE
LARKIN, COUNCILMEMBER NATALIE
LARSEN, COUNCILMEMBER GREGG
MCARTHUR, COUNCILMEMBER
MICHELLE TANNER, MAYOR MICHELE
RANDALL, and CITY MANAGER JOHN
WILLIS,

Defendants.

**ORDER GRANTING STIPULATED
MOTION TO STAY**

Civil No. 4:23CV44

Honorable David Nuffer

Pursuant to the Stipulated Motion to Stay submitted by Plaintiffs Southern Utah Drag Stars, LLC and Mitski Avalox, and Defendants City of St. George, City Council of St. George, Councilmembers Jimmie Hughes, Danielle Larkin, Natalie Larsen, Gregg McArthur, and Michelle Tanner, Mayor Michelle Randall, and City Manager John Willis, and for good cause shown, the Court hereby GRANTS the Stipulated Motion to Stay.

IT IS SO ORDERED.

DATED this _____ day of October, 2023.

BY THE COURT

Honorable David Nuffer
United States District Court Judge
Honorable Paul Kohler
United States District Court Magistrate Judge

Approved as to Form:

DATED this 3rd day of October, 2023.

AMERICAN CIVIL LIBERTIES UNION OF
UTAH

/s/ John Mejia (Signed with permission)
John Mejia
Attorney for Plaintiffs

DATED this 3rd day of October, 2023.

SNOW CHRISTENSEN & MARTINEAU

/s/ Scott Young
R. Scott Young
Attorneys for Defendants