

NORTH CAROLINA
ORANGE COUNTY

IN THE GENERAL COURT OF JUSTICE
SUPERIOR COURT DIVISION
25CVS002442-670

CHRIS CLEMENS,

Plaintiff,

v.

UNIVERSITY OF NORTH CAROLINA AT
CHAPEL HILL, et al.,

Defendants.

JOINT MOTION TO STAY

NOW COME Plaintiff Chris Clemens and Defendants University of North Carolina at Chapel Hill, et al., by and through their counsel of record, and jointly move for an Order staying this proceeding from the time of the filing this motion through 45 days following entry of the order staying the proceeding, and in support thereof show the Court the following:

1. The parties have entered into settlement discussions that may facilitate resolution of certain matters in dispute in this litigation.
2. A stay will provide the parties with an opportunity to engage in good-faith settlement discussions and will serve the interests of judicial economy.
3. The parties make this motion in good faith and not for the purposes of delay.
4. During the stay period, the parties agree that all deadlines for discovery, including responses to Interrogatories, Requests for Production, and Requests for Admission between the parties and subpoenas issued to nonparties, shall be stayed. All motion deadlines and other case management deadlines shall likewise be stayed. The parties agree to negotiate in good faith the deadlines for responding to previously issued discovery at the end of the stay period.
5. The stay shall not affect the Court's jurisdiction over this matter or any party's ability to move to lift the stay to seek emergency relief if exigent circumstances arise.
6. At the expiration of the stay period, or earlier upon agreement of the parties, the parties shall file a joint status report advising the Court of the status of their settlement discussions and proposing a schedule for further proceedings.
7. A Proposed Order is attached hereto.

WHEREFORE, the parties respectfully request that this Court enter the attached Order staying proceedings between the parties in this matter from the time of the filing this motion through 45 days following entry of the order staying the proceedings.

Respectfully submitted this 9th day of January, 2026.

FOR PLAINTIFF:

/s/ David McKenzie
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FOR DEFENDANTS:

/s/ Wes J. Camden
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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing document was filed this day using this Court's electronic filing system, which will automatically and electronically serve all counsel of record and emailed to Plaintiff's counsel at the email address below.

David McKenzie
621 Transylvania Avenue
Raleigh, NC 27609
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This the 9th day of January 2025.

/s/ Wes J. Camden
Wes J. Camden