

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF GEORGIA
AUGUSTA DIVISION

QUINCY J. CANNON)
) Case Number
Plaintiff,) 1:24-cv-00035-JRH-BKE
)
V.) Demand for Jury Trial
)
RICHMOND COUNTY SHERIFF'S)
DEPARTMENT,)
)
Defendant.)

**PLAINTIFF'S MOTION TO STAY THE CASE FOR NINETY DAYS IN
ORDER TO ALLOW PLAINTIFF TO RETAIN NEW COUNSEL**

COMES NOW, Plaintiff Quincy J. Cannon, ("Plaintiff") respectfully moves for a stay of ninety days in this case, including, but not limited to, the Court's ruling on Defendant's Motion to Dismiss and all pending deadlines in this case so that Plaintiff's current counsel may properly withdraw from the case and Plaintiff may retain new counsel (unknown at this time) and permit his new counsel to make decisions relevant to how his case proceeds. In support of this Motion, Plaintiff shows the Court the following:

1. Plaintiff filed his Complaint [7] against Defendant on May 6, 2024.
2. Defendant filed a Motion to Dismiss [10] on June 5, 2024.
3. Plaintiff did not timely respond to Defendant's Motion to Dismiss and that

Motion is pending.

4. Current counsel has notified their client of their intent to withdraw and current counsel is preparing their Motion to Withdraw as Counsel.
5. District courts have inherent, discretionary authority to issue stays in cases.
6. Plaintiff respectfully requests that the Court stay this matter for ninety days in order for his current counsel to withdraw from the case and for him to find and engage new counsel.
7. This stay is being sought in good faith and is not sought for the purpose of delay.

WHEREFORE, Plaintiff respectfully request the Court grant his Motion to Stay and enter the proposed order attached hereto as Exhibit 1.

Respectfully submitted this 19th day of July, 2024.

MARTIN & MARTIN, LLP
By: /s/Thomas F. Martin
Thomas F. Martin
tfmartinlaw@msn.com
Georgia Bar No. 482595
MARTIN & MARTIN, LLP
Post Office Box 1070
Tucker, Georgia 30085-10170
(770) 344-7267

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF GEORGIA
AUGUSTA DIVISION

QUINCY J. CANNON)
) Case Number
Plaintiff,) 1:24-cv-00035-JRH-BKE
)
V.) Demand for Jury Trial
)
RICHMOND COUNTY SHERIFF'S)
DEPARTMENT,)
)
Defendant.)

**ORDER STAYING THE CASE FOR NINETY DAYS IN ORDER TO
ALLOW PLAINTIFF TO RETAIN NEW COUNSEL**

Having read and considered Plaintiff's Motion to Stay the Case for Ninety Days to Allow Plaintiff to Retain New Counsel, IT IS HEREBY ORDERED, ADJUDGED AND DECREED that this case, including the Court's ruling on Defendant's Motion to Dismiss and all pending deadlines in this case are stayed and the Plaintiff is ordered to retain new counsel within thirty days, no later than August than August 19, 2024. All other deadlines are postponed accordingly.

So ORDERED, this ___ day of _____, 2024.

Honorable Brian K. Epps
Unites States Magistrate Judge