

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

JOSEPH FARAH, et. al

Plaintiffs,

v.

ESQUIRE MAGAZINE, et. al.,

Defendants.

Civil Action No. 11-01179

**EXPEDITED MOTION TO VACATE STAY ORDER OF JANUARY 30, 2012 AND
REQUEST FOR TELEPHONIC STATUS CONFERENCE**

On January 27, 2012, Plaintiffs respectfully requested a telephonic status conference (Docket No. 13). Three days later, on January 30, 2012 this Court granted Defendants' Motion to Stay Discovery Pending the Court's Ruling on Defendants' Special Motion to Dismiss. Plaintiffs hereby respectfully renew their motion for a telephonic status conference and move to vacate the Stay Order.

This Court has stayed discovery based on the DC Anti-SLAPP statute. This statute has recently been held inapplicable in this District Court. *3M Corporation v. Boulter*, No. 11-cv-1527 (RLW) (D.D.C.). Thus, the Stay Order should respectfully be immediately vacated and Defendants' Special Motion to Dismiss should respectfully be disposed of as soon as practicable. This case must respectfully move forward and the sides should set a time for a discovery conference as provided in Rule 26 of Fed. R. Civ. P. The complaint in this action was filed June 28, 2012, about ten months ago, and Plaintiffs would like to move forward, especially since there is continuing harm being caused by Defendants. Plaintiffs respectfully request a telephonic status conference in the

next days so the Court can set up a timetable for proceeding forward with the case. Defendants do not consent to this motion.

Dated: April 16, 2012

Respectfully Submitted,

/s/ Larry Klayman
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