

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
BECKLEY**

UNITED STATES OF AMERICA,

PLAINTIFF,

v.

CRIMINAL CASE NO. 5:24-cv-00456

RYAN BAILEY and RKB, INC.,

DEFENDANTS.

DEFENDANT'S MOTION FOR STAY

Comes now Defendants, Ryan Bailey and RKB, Inc. (collectively, "Defendants"), by counsel, G. Todd Houck, and hereby moves this Honorable Court to grant unto Defendant stay in the instant matter. Defendant would state that this matter is cojoined to a parallel criminal action involving substantially similar issues to those alleged in the instant civil action. Defendant's Co-Defendant, in said criminal matter, has filed a motion for stay [see 5:24-cv-00455, Page ID# 36-41] in his likewise separate civil matter, and Defendant relies on the same legal authorities as outlined in the attached memorandum in support of this instant motion.

RESPECTFULLY SUBMITTED,

**RYAN BAILEY
By Counsel**

**G. TODD HOUCK
COUNSEL FOR DEFENDANT**

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing “**DEFENDANT’S MOTION FOR STAY**” has been electronically filed with the Clerk of this Court, this 22nd day of November, 2024, using the CM/ECF system and served upon opposing counsel as follows:

VIA CM/ECF: Fred B. Westfall, Jr.
Assistant United States Attorney
300 Virginia Street East, Room 4000
Charleston, WV 25301

DATE: November 22, 2024

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