

SEP 28 2015

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PARK COUNTY CLERK  
OF DISTRICT COURT  
JUNE LITTLE

2015 SEP 23 PM 4 35

MONTANA SIXTH JUDICIAL DISTRICT COURT, PARK COUNTY

FILED  
BY *Molly Brackberry*  
DEPUTY

Daniel K. O'Connell & Valery A. O'Connell )  
& on behalf of themselves as members of )  
Glastonbury Landowners Association. )

Plaintiff(s), )

v. )

Glastonbury Landowners Association, Inc. )  
& current GLA Board of Directors )

Defendant(s) )

Cause No. DV-11-114  
Hon. Judge Cybulski

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PLAINTIFFS RULE 62 MOTION & BRIEF FOR STAY OF ORDERS 9-17-15

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COME NOW Plaintiffs, per M.R.Civ.P., Rule 62, to hereby file this MOTION & BRIEF FOR STAY OF ORDERS dated 09-17-15.

**ARGUMENT & BRIEF**

Plaintiffs request Orders dated September 17, 2015 should be stayed pending adjudication of the Affidavit for Disqualification with cause submitted Sept. 23rd, 2015. Also because Plaintiffs therein that affidavit and forthcoming rule 60 motion will show Plaintiffs can not possibly comply with such Orders.

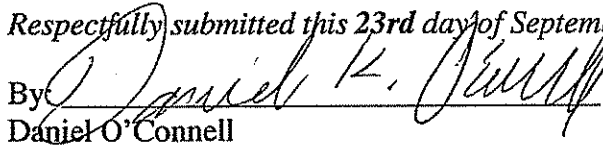
This stay is for good cause also since Plaintiffs can not comply with Orders ¶ 5 "within 5 business days" due today because Plaintiffs do not have "the minutes referenced." Also because Plaintiffs can not comply with Orders ¶ 4, for the stated reasons in Plaintiffs' affidavit referenced here as if fully incorporated herein. This is also because Plaintiffs need time to file a rule 60

challenging all other Orders and these Orders as being arbitrary and capricious, unconstitutional, and bias and prejudice against Plaintiffs case and more.

M.R.Civ.P., Rule 62: "**Stay of Proceedings to Enforce a Judgment.** (b) Stay Pending the Disposition of a Motion. On appropriate terms for the opposing party's security, the court may stay the execution of a judgment -- or any proceedings to enforce it -- pending disposition of any of the following motions: (4) under Rule 60, for relief from a judgment or order..."

For good cause cited above, Plaintiffs request Orders dated September 17, 2015 should be stayed pending adjudication of the Affidavit for Disqualification submitted Sept. 23rd, 2015.

*Respectfully submitted this 23rd day of September, 2015.*

By:   
Daniel O'Connell

By:   
Valery O'Connell

#### Certificate of Service

A true and correct copy of the **forgoing documents** were sent to all parties via first class mail on the following business day to:

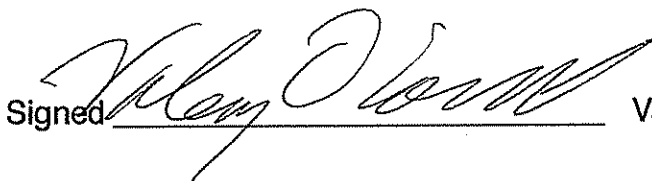
Sixth Judicial District Clerk of Court  
414 E. Callender St.  
Livingston, Mt. 59047

Alannah Griffith  
108 N. 11th, Unit #1  
Bozeman, Mt. 59715

Hon. Judge David Cybulski  
573 Shippe Canyon Rd.  
Plentywood, Mt. 59254

Brown Law Firm, P.C.  
315 N. 24th St. (PO Drawer 849)  
Billings, MT. 59103-0849

Signed



Valery O'Connell