

**STATE OF MINNESOTA****DISTRICT COURT****COUNTY OF RAMSEY****SECOND JUDICIAL DISTRICT****CASE TYPE: DISCRIMINATION**

JayCee Cooper,

Court File No. 62-CV-21-211

Judge: Patrick C. Diamond

Plaintiff,

vs.

**DEFENDANT'S NOTICE OF MOTION  
AND MOTION FOR STAY PENDING  
APPEAL**

USA Powerlifting; and

USA Powerlifting Minnesota,

Defendants.

TO: Plaintiff, JayCee Cooper, and her attorneys David Schlesinger, Nichols Kaster PLLP, 4700 IDS Center, 80 South Eighth Street, Minneapolis, MN 55402, Matthew Frank, Premo Frank PLLC, 300 Union Plaza, 333 Washington Ave N., Minneapolis, MN 55401, Christy Hall and Jess Braverman, Gender Justice, 663 University Ave W Suite 200, St. Paul, MN 55104

**NOTICE OF MOTION**

PLEASE TAKE NOTICE that Defendant American Drug Free Powerlifting Association d/b/a USA Powerlifting, by and through its undersigned counsel, will bring the following motion on April 11, 2023, at 9:00 a.m., or such other date and time as the Court may determine, before the Honorable Patrick C. Diamond, Ramsey County District Judge, via a remote Zoom hearing, with appearance made by video and audio unless directed otherwise by the Court.

**MOTION**

Pursuant to Minn. R. Civ. P. 62.02 and 62.03 and Minn. R. Civ. App. P. 108.02, Defendant USA Powerlifting hereby move the Court for an order granting Defendant's motion to stay all further district court proceedings pending appeal of this matter to Minnesota's appellate courts, or, in the alternative, to stay the injunctive relief ordered by the Court in its February 27, 2023 Order pending appeal. This motion is based upon the attached Memorandum of Law, all the files, records, and proceedings herein, and the arguments of counsel at the hearing.

**ACKNOWLEDGEMENT**

The undersigned hereby acknowledges that sanctions may be awarded pursuant to Minn. Stat. § 549.211.

Dated: March 13, 2022

**MONROE MOXNESS BERG PA**

By: /s/ Ansis V. Viksnins

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**ATTORNEYS FOR DEFENDANT USA  
POWERLIFTING**