1 2 3 4 5 6 7 8	Alan Alexander Beck (S.B.N. 276646) 3985 Hamilton Street San Diego, CA 92104 (619) 971-0414 Alan.alexander.beck@gmail.com	
9	UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF CALIFORNIA	
10		
11 12	LYCURGAN INC. DBA ARES ARMOR	Case No.: 14CV0548JLS (BGS)
13	Plaintiff.	O JOINT MOTION FOR AN AGREED ORDER
14	v.))
15	B. TODD JONES in his Official Capacity As Head of The BATFE,	Judge: Hon. Janis Sammartino)
16	Defendant.)
17 18	JOINT MOTION FOR AN AGREED ORDER	
19		
20	Plaintiff, Lycurgan Inc. DBA Ares Armor ("Plaintiff") and Defendant B.	
21	Todd Jones ("Defendant") respectfully submit this Joint Motion for an Agreed	
22		
23	Order in the above-captioned matter. The parties move this Court to stay the case,	
24	and toll any deadlines pending the resolution of the motion to unseal the affidavit	
25	filed in support of the issuance of the sea	rch warrant in case number 3:14-cv-
26 27	01424-JLS-BGS, presently scheduled for hearing on July 31, 2014. They further	
28	agree that Plaintiff will apply to the court	t for permission to file an amended

1	complaint within seven days following entry of the court's ruling on the motion to	
2	unseal the warrant.	
3		
4		
5	Respectfully Submitted,	/s/ Alan Beck
6		Alan Beck
7		Attorney for Lycurgan Inc. DBA Ares Armor <u>alan.alexander.beck@gmail.com</u>
8		
9		/s/Daniel Butcher
10		Daniel Butcher Attorney for B. TODD JONES
11		daniel.butcher@usdoj.gov
12		
13		
14		
15		
16		
17		
18		
19		
20		
21		
22		
23		
24		
25		
26		
27		
28		

	<u>CERTIFICATE OF SERVICE</u>	
1	On this, the 13 th day of August, 2013, I served the foregoing pleading by	
2 3	electronically filing it with the Court's CM/ECF system, which generated a Notice	
4	of Filing and effects service upon counsel for all parties in the case. I declare under	
5	penalty of perjury that the foregoing is true and correct.	
6		
7		
8	/s/ Alan Beck	
9	Alan Beck	
10		
11		
12		
13		
14		
15		
16		
17		
18		
19		
20		
21		
22		
23		
24		
25 26		
20 27		
$\begin{bmatrix} 27 \\ 28 \end{bmatrix}$		
20		