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Spencer Cornelia, Cornelia Media LLC,
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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

WEALTHY INC., and DALE BUCZKOWSKI,

Plaintiffs,

v.

SPENCER CORNELIA, CORNELIA MEDIA
LLC, and CORNELIA EDUCATION LLC,

Defendants.

Case No. 2:21-cv-01173-JCM-EJY

**DEFENDANTS' MOTION TO STAY
CASE**

Defendants Spencer Cornelia, Cornelia Media, LLC, and Cornelia Education, LLC (collectively, "Defendants"), move the Court for an order staying this case until the motions to dismiss for lack of personal jurisdiction filed by the defendants in the related case of *Wealthy Inc. v. Mulvehill*, No. 2:22-cv-00740-JCM-EJY, are resolved.

On August 16, 2022, Defendants filed a motion to consolidate this case and the Mulvehill case (ECF No. 43). At the same time, Defendants filed a motion to intervene for the purpose of seeking consolidation in the Mulvehill case (Mulvehill ECF No. 31). Each of the defendants in the Mulvehill case previously filed motions to dismiss on the ground that the Court lacked personal jurisdiction over them, and each of these motions is still pending. (*See* Mulvehill ECF Nos. 14, 15, & 29).

1 On August 30, 2022, the defendants in the Mulvehill case filed a limited opposition to the
2 motion to intervene and consolidate, arguing that the Court should resolve their motions to dismiss
3 before deciding the consolidation motion. (*See* Mulvehill ECF Nos. 34 & 35.)

4 As the Motion to Consolidate explains, there would be significantly utility in consolidating
5 the cases due to their similarities, and no one would be prejudiced by consolidation. The utility of
6 consolidation, however, would be hampered if consolidation takes place only after the motions to
7 dismiss are decided, as the parties may have already been required to prepare and file summary
8 judgment motions by that point.

9 There is logic to the Mulvehill defendants' position, as the cases indeed should not (and
10 perhaps cannot) be consolidated if the Court lacks personal jurisdiction. Accordingly, rather than
11 decide the consolidation motion prematurely, the Court should stay this case for all purposes until
12 after the Mulvehill defendants' motions to dismiss are decided.

13
14 Dated: August 30, 2022.

Respectfully Submitted,

/s/ Marc J. Randazza

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Case No. 2:21-cv-01173-JCM-EJY

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on August 30, 2022, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF. I further certify that a true and correct copy of the foregoing document being served via transmission of Notices of Electronic Filing generated by CM/ECF.

/s/ Marc J. Randazza
Marc J. Randazza,
Randazza Legal Group, PLLC

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