

**IN THE UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF GEORGIA  
ALBANY DIVISION**

<b>SAFER HUMAN MEDICINE, INC.,</b>	)	
	)	
<b>Plaintiff,</b>	)	
	)	
v.	)	
	)	<b>Civil Action File No.</b>
<b>DECATUR COUNTY-BAINBRIDGE</b>	)	<b>1:24-CV-00027-LAG</b>
<b>INDUSTRIAL DEVELOPMENT</b>	)	
<b>AUTHORITY,</b>	)	
	)	
<b>Defendant.</b>	)	

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**CONSENT MOTION TO STAY CASE**

COME NOW Plaintiff Safer Human Medicine, Inc. and Defendant Decatur County-Bainbridge Industrial Development Authority (collectively, the “Parties”) and file this Consent Motion to Stay Case, showing the Court as follows:

1. Plaintiff filed its Verified Complaint (Doc. 1) on February 13, 2024.
2. That same day, Plaintiff filed a Motion for Preliminary Injunction (Doc. 2) and Motion for Emergency Hearing and Shortened Briefing Schedule (Doc. 3).
3. In the Motion for Preliminary Injunction, Plaintiff requested the Court toll the closing deadline contained in the Parties’ Project Agreement (as defined in the Verified Complaint) pending the resolution of this case.
4. On February 15, 2024, the Court granted Plaintiff’s Motion for Emergency Hearing and Shortened Briefing Schedule (*see* Doc. 6) and ordered Defendant to respond to Plaintiff’s Motion for Preliminary Injunction on or before February 20, 2024.

5. Prior to the filing of the Verified Complaint, an appeal was noticed from the Superior Court of Decatur County, Georgia, in the case of *State v. Decatur County-Bainbridge Industrial Development Authority, et al.*, No. 23CV00260, to the Georgia Court of Appeals, but that appeal has not yet been docketed. That appeal may have some affect on the issues in this case.

6. The Parties have engaged in discussions concerning Plaintiff's Motion for Preliminary Injunction and further proceedings in this case.

7. The Parties request the Court grant Plaintiff's Motion for Preliminary Injunction and toll the closing deadline stated in the Project Agreement and all other deadlines related to the Project (as defined in the Verified Complaint) to maintain the status quo pending resolution of this case.

8. The Parties further request the Court stay this case for 120 days, or until the resolution of the appeal of *State v. Decatur County-Bainbridge Industrial Development Authority, et al.*, whichever is sooner.

9. A proposed consent order granting the requested relief is being presented herewith.

Respectfully submitted this 20th day of February, 2024.

*[Signatures on Following Page]*

WATSON SPENCE LLP

/s/ Alfreda L. Sheppard  
Alfreda L. Sheppard  
Georgia Bar No: 525106  
F. Faison Middleton, IV  
Georgia Bar No: 504745  
Post Office Box 2008  
Albany, Georgia 31702-2008  
(229) 436-1545 Telephone  
(229) 436-6358 Facsimile  
[asheppard@watsonspence.com](mailto:asheppard@watsonspence.com)  
[fmiddleton@watsonspence.com](mailto:fmiddleton@watsonspence.com)

T. Joshua R. Archer  
Georgia Bar No. 021208  
Email: [jarcher@balch.com](mailto:jarcher@balch.com)  
Walter E. Jones  
Georgia Bar No. 163287  
Email: [wjones@balch.com](mailto:wjones@balch.com)  
Hugh Peterson  
Georgia Bar No. 574212  
Email: [hpeterson@balch.com](mailto:hpeterson@balch.com)  
Patrick Silloway  
Georgia Bar No. 971966  
Email: [psilloway@balch.com](mailto:psilloway@balch.com)  
Jordan Walker  
Georgia Bar No. 861627  
Email: [jwalker@balch.com](mailto:jwalker@balch.com)

**BALCH & BINGHAM LLP**

30 Ivan Allen Jr. Boulevard, N.W.  
Suite 700  
Atlanta, GA 30308  
Telephone: (404) 261-6020  
Facsimile: (404) 261-3656

*Attorneys for Plaintiff SAFER HUMAN MEDICINE, INC.*

s/ Michael E. Kozlarek

Michael E. Kozlarek

Georgia Bar No. 141591

Email: michael@kingkozlarek.com

**KING KOZLAREK ROOT LAW LLC**

223 North Donalson Street

Suite 36

Bainbridge, Georgia 39817

Telephone: (229) 726-0127

*Attorneys for Defendant DECATUR COUNTY-  
BAINBRIDGE INDUSTRIAL DEVELOPMENT  
AUTHORITY*

**CERTIFICATE OF SERVICE**

I certify that on February 20, 2024, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will automatically send e-mail notification of such filing to all attorneys of record.

*/s/ Alfreda L. Sheppard*

Alfreda L. Sheppard

Ga. Bar No.: 525106