

IN THE SUPERIOR COURT FOR THE STATE OF ALASKA
THIRD JUDICIAL DISTRICT AT ANCHORAGE

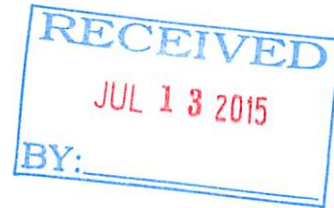
ALASKA BUILDING, INC., an Alaska)
corporation,)

Plaintiffs,)

vs.)

716 WEST FOURTH AVENUE LLC,)
KOONCE PFEFFER BETTIS, INC., d/b/a)
KPB ARCHITECTS, PFEFFER)
DEVELOPMENT, LLC, LEGISLATIVE)
AFFAIRS AGENCY, and CRITERION)
GENERAL, INC.,)

Defendants.)



Case No.: 3AN-15-05969 Civil

**REPLY TO PLAINTIFF'S OPPOSITION TO MOTION TO STAY
PROCEEDINGS¹**

716 West Fourth Avenue, LLC ("716") previously joined the Legislative Affairs Agency ("LAA") Motion to Stay Proceeding. Having reviewed LAA's Reply in support of Motion to Stay Proceedings, 716 agrees with the arguments set forth within that pleading and adopts and incorporates them in full to the extent they are not contrary to 716's Motion to Dismiss.²

A stay of proceedings while the Court addresses the threshold issue of standing will promote judicial economy and avoid the parties from engaging in needless litigation. As emphasized in 716's Motion to Stay Discovery and Rule 57(f) Request,

¹ 716 filed a request on June 30, 2015 to Extend Deadline for Responding to Motions. The Court denied expedited consideration on July 2, 2015, but the underlying extension request remains pending.


² See Reply in Support of Motion to Stay Proceedings at 4 (716 does challenge ABI's competency to bring forth its suit).

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ABI cannot show how a stay in proceedings pending resolution of the standing issue will cause it undue prejudice. The Court should grant a stay of proceedings in this matter until the issue of standing is decided.

ASHBURN & MASON, P.C.
Attorneys for 716 West Fourth Avenue, LLC

DATED: 7/10/15

By: 
for Jeffrey W. Robinson
Alaska Bar No. 0805038

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Alaska Building, Inc. vs. 716 West Fourth Avenue, LLC, et. al. 3AN-15-05969Civil

{10708-101-00277359;1}

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CERTIFICATE OF SERVICE

I certify that a copy of the foregoing was served via hand-delivery facsimile U.S. Mail on the 10th day of July 2015, on:

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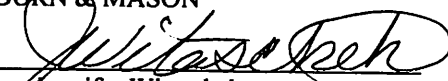
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By:


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