

CONSERVE COMMUNITY  
LLC, JULIE LEIZERMAN,  
PATRICIA LINS, LAWRENCE  
SUTTER, ALICE AND  
TIMOTHY ACKMERAN,  
JUELY K. AND TIMOTHY J.  
BARTHOLOMEW, JOAN  
KRULL, KENNETH ALAN  
BUSSART, BORGERT COME  
BOURGEOIS AND SHARON  
KYLE BOURGEOIS, MARY  
HERMES, AND SHARA WEITZ  
LAMMER,

Plaintiffs,

v.

Case No. 09 CV54

CONSERVE SCHOOL  
CORPORATION, CONSERVE  
SCHOOL TRUST, C. DANIEL  
BLYTHE, JOHN F. CALHOUN,  
MICHAEL J. SULLIVAN,  
RONALD V. KAZMAR,  
MICHAEL X. CRONIN, JAMES  
RINN, STEFAN ANDERSON,  
AND JOHN DOES 1-5,

Defendants.

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J.B. VAN HOLLEN, in his  
capacity as the Attorney General  
of the State of Wisconsin,

Intervening Plaintiff,

v.

CONSERVE SCHOOL  
CORPORATION and JOHN F.  
CALHOUN, MICHAEL X.  
CRONIN, RONALD V.  
KAZMAR, CHRISTOPHER  
ROGERS and MICHAEL J.  
SULLIVAN, directors of the  
CONSERVE SCHOOL  
CORPORATION,

Defendants.

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NOTICE OF MOTION  
AND MOTION FOR STAY  
PENDING APPOINTMENT OF CUSTODIAN

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PLEASE TAKE NOTICE that Attorney General J.B. Van Hollen, at a time, date, and place to be set by the court, moves the court for a stay of all proceedings pending a decision on the Attorney General's Motion to Intervene, a decision on the Motion for Appointment of a Custodian and, if such motion is granted, for an additional period of time sufficient to allow the custodian to decide what steps should be taken on behalf of the Conserve School Corporation with respect to the other pending issues in this action.

The ground for this motion are that the issues pending before the court should be heard only after a custodian has been appointed, had an opportunity to evaluate the Corporation's affairs, and take such action as may be appropriate in the judgment of the custodian.

Dated this \_\_\_ day of April, 2009.

J.B. VAN HOLLEN  
Attorney General

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