

**DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

LEAGUE OF INDPENDENT FITNESS
FACILITIES AND TRAINERS, INC.,
BASELINE FITNESS LLC,
BUILDING YOUR TEMPLE LLC,
BYT FITNESS 247 LLC,
CLAWSON FITNESS, LLC,
CLINTON FITNESS, INC.,
D-LUX KARATE UNIVERSITY LLC,
FENTON ATHLETIC CLUB, INC.,
FENTON KARATE, LLC,
FUSION FITNESS 24/7 LLC,
H3 FITNESS LLC,
I FITNESS PERSONAL TRAINING, INC.,
JKP FITNESS, LLC,
JPF ENTERPRISES, LLC,
M FITNESS CLUB, LLC,
MH & AB LLC,
MOTOR CITY CF - ST. CLAIR SHORES,
LLC,
NASCOT ENTERPRISES, LLC,
PRISON CITY PHYSIQUE LLC,
RMP FITNESS INC.,
STRENGTH BEYOND LLC,
24/7 BOOTCAMP AND BOXING INC., and
4 SEASONS GYM, LLC,

Plaintiffs,

v.

GRETCHEN E. WHITMER and
ROBERT GORDON,

Defendants.

Civil No. 1:20-cv-00458

Hon. Paul L. Maloney

*****ORAL ARGUMENT REQUESTED*****

ERSKINE LAW, PC
Scott M. Erskine (P54734)
Carly Van Thomme (P59706)
Attorneys for Plaintiffs
612 W. University
Rochester, MI. 48307
(248) 601-4499
serskine@erskinelaw.com
cvanthomme@erskinelaw.com

Joseph T. Froehlich (P71887)
Christopher M. Allen (P75329)
Joshua O. Booth (P53847)
John G. Fedynsky (P65232)
Andrew J. Jurgensen (P81123)
Assistant Attorney General
Michigan Department of Attorney General
Attorneys for Defendants
525 West Ottawa Street
P.O. Box 30754
Lansing, MI 48909
(517) 335-7573
froehlichj1@michigan.gov
allenc28@michigan.gov
Boothj2@michigan.gov
fedynskyj@michigan.gov
jurgensenA2@michigan.gov

**PLAINTIFFS' RESPONSE IN OPPOSITION
TO DEFENDANTS' MOTION FOR STAY**

*****ORAL ARGUMENT REQUESTED*****

NOW COMES Plaintiffs, League of Independent Fitness Facilities and Trainers, Inc., by and through their attorneys, Erskine Law, PC, for Plaintiffs' Response in Opposition to Defendants' Motion for Stay. For the reasons stated in Plaintiffs' Response Brief in Opposition to Defendants' Motion for Stay, Plaintiffs respectfully request that Defendants' Motion for Stay be denied in its entirety.

Dated: June 22, 2020

Respectfully submitted,

/s/ Scott M. Erskine
SCOTT M. ERSKINE (P54714)
CARLY VAN THOMME (P59706)
ERSKINE LAW, PC
Attorneys for Plaintiffs
612 West University Drive
Rochester, Michigan 48307
(248) 601-4497
serskine@erskinelaw.com

PROOF OF SERVICE

I hereby certify that on June 22, 2020, I presented the foregoing paper to the Clerk of the Court for filing and uploading to the ECF system, which will send notification of such filing to the attorneys of record listed herein and I hereby certify that I have mailed by US Postal Service the document to the involved non participants.

s/ Scott M. Erskine

SCOTT M. ERSKINE (P54714)

CARLY VAN THOMME (P59706)

ERSKINE LAW, PC

Attorneys for Plaintiffs

612 West University Drive

Rochester, Michigan 48307

(248) 601-4497

serskine@erskinelaw.com

cvanthomme@erskinelaw.com