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Louisiana fully to implement its Executive Order and the Board to promulgate a new rule, under the Governor's supervision.

On November 27, 2017, the stay lifted. That day, the Board filed a Motion to Dismiss and Complaint Counsel filed a Motion for Partial Summary Decision. The Board sought oral argument on both motions. On January 10, 2017, the Commission granted the Board's request for oral argument and specifically requested that the parties focus their arguments on the following question:

Complaint Counsel are actively pursuing discovery, including from numerous party and third-party witnesses. The Board is a self-funded governmental entity with limited financial resources. Prior to a decision on either motion, the parties collectively may need to take (or defend) 30 or more depositions, and will incur substantial costs for travel, court reporting services, and attorneys' fees. Because of the scope of the Complaint allegations regarding impact on the real estate appraisal market in Louisiana, additional third party document subpoenas will need to be issued, beyond the more than 60 subpoenas already issued. Under the current schedule, Respondent will incur substantial expert witness costs to meet expert report deadlines set for late March and early April. A Commission ruling on either or both motions could significantly impact whether any or all of this extensive effort and expense in fact and expert discovery is necessary. *See* Order Granting In Part Motion to Stay Part 3 Proceedings at 3 (“[E]ven if, at the

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longer would fund that survey, and that the survey could not be used for any purpose after December 31, 2017. *See* LREAB Mem. in Support of Motion to Dismiss, at 2, 24 and Ex. 10; <http://www.reab.state.la.us/forms/11-20-17LREABPolicyStatement.pdf>. Moreover, should the stay be granted, the Board will agree not to commence an enforcement action under Replacement Rule 31101 pending a decision by the Commission.

CONCLUSION

For good cause shown and the reasons stated above, Respondent respectfully requests that the Commission (1) stay proceedings until either April 9, 2018 or until the Commission renders a decision on both Respondent's Motion to Dismiss and Complaint Counsel's Motion for Partial Summary Decision and (2) move the administrative hearing date to August 27, 2018.

Respondent requests expedited consideration, and a decision on its Motion by January 12, 2018.

Dated: January 11, 2018

Respectfully submitted,

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