

1 Aditya Dynar (031583)
2 New Civil Liberties Alliance
3 1225 19th St. NW, Suite 450
4 Washington, DC 20036
5 (202) 869-5210
6 Adi.Dynar@NCLA.legal
7 *Attorney for Appellant*

8 **SUPERIOR COURT OF ARIZONA**
9 **MARICOPA COUNTY**

10 **Phillip B.,**

11 *Appellant*

12 vs.

13 **Gregory McKay;**

14 **Arizona Department of Child Safety,**

15 *Appellees*

Case No. _____

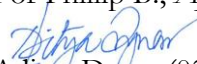
16 **MOTION FOR STAY OF AGENCY DECISION**
17 **(ORAL ARGUMENT REQUESTED)**

18 Pursuant to A.R.S. § 12-911 and JRAD Rule 3, Appellant Phillip B. respectfully requests a
19 stay of the agency decision pending the final disposition of the appeal for the reasons set forth in the
20 accompanying Memorandum of Points and Authorities. If granted, the motion will stay the decision
21 of the Arizona Department of Child Safety (DCS), in *In the Matter of Phillip B.*, in Cause No. 19C-
22 1028237-DCS, entered on July 28, 2019, that “ORDERED that DCS’s proposed finding of abuse in
23 this matter is substantiated and shall be placed on the DCS Central Registry in accordance with
24 A.R.S. § 8-804,” and “ORDERED that the report in this matter shall remain substantiated.”
25 Ex.2:009.

26 There are three Exhibits attached to this motion. This motion is filed contemporaneously
with the Notice of Appeal and served on the Appellees pursuant to JRAD Rules 2(c), 4(e), and Ariz.
R. Civ. P. 4.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26


Respectfully submitted this 30th day of August 2019.

For Phillip B., *Appellant*

Aditya Dynar (031583)
New Civil Liberties Alliance
1225 19th St. NW, Suite 450
Washington, DC 20036
(202) 869-5210
Adi.Dynar@NCLA.legal
Attorney for Appellant

A copy of this Motion will be served pursuant to Rules 2(c) and 4(e) of the Arizona Rules of Procedure for Judicial Review of Administrative Decisions, and Rule 4 of the Arizona Rules of Civil Procedure on the following parties:

Appellee Gregory McKay

Appellee Arizona Department of Child Safety


Aditya Dynar
New Civil Liberties Alliance
Attorney for Appellant