

AUG 10, 2026 04:47 PM

IN THE SUPERIOR COURT OF PICKENS COUNTY  
STATE OF GEORGIA

BIG CANOE PROPERTY OWNERS'  
ASSOCIATION, INC.,

Plaintiff,

v.

BIG CANOE COMPANY, LLC, and  
BIG CANOE HOLDINGS GROUP, LLC,

Defendants.

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CIVIL ACTION FILE NO.  
2026SUCV0326

  
Jennifer E. Jordan, Clerk  
Pickens County, Georgia

**DEFENDANTS' MOTION FOR PROTECTIVE ORDER**

COME NOW Defendants Big Canoe Company, LLC ("BCC") and Big Canoe Holdings Group, LLC ("BCC Holdings" and collectively, "Defendants") and pursuant to O.C.G.A. § 9-11-26(c) request that the Court enter a protective order with regard to the written discovery requests served by Plaintiff upon Defendants, copies of which are attached to the brief filed contemporaneously herewith and incorporated by reference herein ("Plaintiff's Written Discovery Requests"). The parties agreed to an extension of the time for Defendants' response to the Plaintiff's Written Discovery Request to August 8, 2026, which is carried forward to August 10, 2026, by virtue of O.C.G.A. § 9-11-6(a) and O.C.G.A. § 1-3-1(d)(3). Defendants show the Court that discovery is stayed pursuant to O.C.G.A. § 9-11-12(j) because on August 7, 2026, Defendants have filed a Motion to Dismiss Plaintiff's Complaint for Failure to State a Claim Upon Which Relief Can be Granted, pursuant to O.C.G.A. § 9-11-12(b)(6).

Defendants rely upon their brief filed contemporaneously herewith in support of their Motion. Defendants' Statement pursuant to Uniform Superior Court Rule 6.4(B) is included in their brief.

WHEREFORE, Defendants respectfully request that this Court grant their Motion and enter a protective order as follows: discovery is stayed pursuant to O.C.G.A. § 9-11-12(j); Defendants are relieved of any obligation to object or otherwise respond to Plaintiff's Written Discovery Requests; and that in the event that the Court were to deny Defendants' Motion to Dismiss, that Defendants would thereafter have 15 days from the date of the entry of said order to respond to Plaintiff's Written Discovery Requests.

This 10<sup>th</sup> day of August, 2026.

/s/ John R. Grimes

John R. Grimes

*(Signed by EDB with express permission)*

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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that I have this day filed the foregoing **DEFENDANTS' MOTION FOR PROTECTIVE ORDER** electronically with the Clerk of Court using PeachCourt, which will send email notification of such filing to counsel of record.

This 10<sup>th</sup> day of August, 2026.

/s/ Edward D. Burch, Jr.

Edward D. Burch, Jr.

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