

1 Jeremy L. Bass, Perforce Pro Se  
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6  
7 **IN THE DISTRICT COURT FOR THE SECOND JUDICIAL DISTRICT**  
8 **FOR THE STATE OF IDAHO, IN AND FOR NEZ PERCE COUNTY**

DPW Enterprises LLC and Mountain Prime 2018  
LLC,

Plaintiff,

vs.

Jeremy L. Bass, Dwayne Pike, and Current  
occupant, and Unknown Parties in  
Possession of the real property commonly  
known as 1515 21<sup>st</sup> Avenue, Lewiston,  
Idaho 83501

Defendants.

Case No. CV35-24-1063

**MOTION FOR STAY UNTIL FINAL JUDGMENT  
AFTER RECONSIDERATION AND APPEAL**

**DEMAND FOR JURY**

9 COMES NOW the Defendant Jeremy L. Bass, (hereinafter "Defendant Bass"), Perforce Pro Se,  
10 and hereby submit to the Honorable Court's a *MOTION FOR STAY UNTIL FINAL JUDGMENT AFTER*  
11 *RECONSIDERATION AND APPEAL* and respectfully moves this Court for an order staying the  
12 enforcement of its interlocutory order granting summary judgment in favor of the Plaintiffs. This  
13 stay is requested until a final judgment is rendered, covering the period necessary for  
14 reconsideration and any subsequent appeals. This motion is based on the following grounds:

15 **I. Basis for Stay**

16 **1. Preservation of Rights During Pending Reconsideration and Appeal:**

- 17 • This stay seeks to prevent premature and potentially irreparable harm to Defendant. The  
18 Court's ruling raises substantive legal issues that warrant reconsideration and, if  
19 necessary, appeal.
- 20 • Defendant's arguments hinge on the controlling question of law regarding the statutory  
21 requirements for "good faith for value" under *Idaho Code § 45-1508*. If the current  
22 interpretation is found to be in error, the harm incurred by enforcing the current ruling  
23 would be substantial and unjust.

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- *IRCP 62(b)* ensures that the Defendant is not subjected to potentially premature enforcement, allowing time for complete judicial review. The stay motion is therefore properly based on *IRCP 62(b)*, which authorizes a temporary suspension of enforcement actions under pending motions.

### III. Relief Sought

Defendant Jeremy L. Bass respectfully requests that this Court grant a stay of enforcement pending the resolution of the Motion for Reconsideration and any necessary appeals.

Dated this 6<sup>th</sup> day of November 2024.  
Respectfully submitted,  
Jeremy L. Bass  
Defendant/ Perforce Pro Se

Signature

# CERTIFICATE OF MAILING

I certify that I have sent by email and first-class mail this *MOTION FOR STAY UNTIL FINAL JUDGMENT AFTER RECONSIDERATION AND APPEAL* to Plaintiffs and Co-Defendant's counsel on November 6<sup>th</sup>, 2024, at the following email address and postal address:

Email: lewis@hwmlawfirm.com [✓]  
Postal: Lewis N. Stoddard, Bar No. 7766 [ ]  
Halliday, Watkins & Mann, P.C.  
376 East 400 South, Suite 300  
Salt Lake City, UT 84111

Ken Nagy  
Idaho Legal Aid Services, Inc.  
Email: [kennagy@idaholegalaid.org](mailto:kennagy@idaholegalaid.org) [✓]  
Counsel for Dwayne Pike

Jeremy L. Bass  
Defendant/ Perforce Pro Se

Signature

**ACKNOWLEDGMENT**

STATE OF IDAHO                    )  
  : ss.  
County of NEZ PERCE            )

On the 6<sup>th</sup> day of November, 2024, before me, the undersigned Notary Public,  
personally appeared Jeremy Bass, known to me to be the person whose name is subscribed  
to the foregoing instrument, and acknowledged to me that s/he executed the same.  
IN WITNESS WHEREOF, I have set my hand and seal the day and year as above written.

\_\_\_\_\_  
Notary Public for Idaho

Residing at \_\_\_\_\_

Commission Expires: \_\_\_\_\_