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Douglas F. Behm - 014727
dbehm@jsslaw.com
JENNINGS, STROUSS & SALMON, P.L.C.
A Professional Limited Liability Company
The Collier Center, 11th Floor
201 East Washington Street
Phoenix, Arizona 85004-2385
Telephone: (602) 262-5911

Peter M. de Jonge (Utah SBN 7184)
Gordon K. Hill (Utah SBN 9361)
THORPE, NORTH & WESTERN, LLP
8180 South 700 East, Suite 350
Sandy, Utah 84070
Telephone: (801) 566-6633
Facsimile: (801) 566-0750

Mark M. Bettilyon (Utah SBN 4798)
Samuel C. Straight (Utah SBN 7638)
RAY QUINNEY & NEBEKER P.C.
36 South State Street, Suite 1400
Salt Lake City, Utah 84145-0385
Telephone: (801) 532-1500
Facsimile: (801) 532-7543

Attorneys for Plaintiff Connor Sport Court
International, Inc.

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA**

CONNOR SPORT COURT
INTERNATIONAL, INC., a California
corporation,

Plaintiff,

vs.

RHINO SPORTS, INC., an Arizona
corporation, JOHN E. SHAFFER,
individually, and DOES 1 through 10,
INCLUSIVE,

Defendants.

CV-06-03066-PHX-SRB

**JOINT MOTION TO TRANSFER
RELATED CASE**

1 Pursuant to the January 17, 2007, order of the Hon. James A. Teilborg,
2 plaintiff Connor Sport Court International, Inc. and defendants Rhino Sports, Inc.
3 (“Rhino”) and John E. Shaffer (“Shaffer”) (hereinafter collectively “Rhino/Shaffer”),
4 by and through undersigned counsel, hereby request that this case be transferred to
5 Judge Teilborg.

6 **MEMORANDUM**

7 In late 2002, Rhino Sports, Inc. and its principal, John Shaffer, filed suit
8 against Sport Court, Inc., in *Rhino Sports, Inc. v. Sport Court, Inc.*, CV-02-1815-
9 JAT. The case concerned Sport Court, Inc.’s trademarks. It was assigned to the Hon.
10 James A. Teilborg and it ended by settlement and the entry of a stipulated permanent
11 injunction by Judge Teilborg on or about March 23, 2004. Judge Teilborg
12 specifically retained jurisdiction of the case to enforce the injunction.

13 On December 21, 2006, Connor Sport Court International (“Sport Court”), the
14 successor in interest to Sport Court, Inc., filed the instant matter, CV-06-03066-PHX-
15 SRB, seeking damages, an injunction, and other relief concerning Rhino/Shaffer’s
16 alleged violations of the permanent injunction since it was filed in 2004.

17 On January 18, 2007, Sport Court also filed a motion in CV-02-1815 for an
18 order to show cause why Rhino/Shaffer should not be held in contempt for alleged
19 violations of the permanent injunction. Sport Court filed that motion with Judge
20 Teilborg because he had retained jurisdiction over the permanent injunction.

21 The complaint in this case and the motion for an order to show cause in CV-
22 02-1815 concern substantially the same parties, facts, and questions of law.
23 Furthermore, there would be substantial duplication of effort if these cases were
24 heard by different judges.

25 In his January 17, 2007, minute entry Judge Teilborg ordered the parties to file
26 a motion to transfer in the “in the case they wish to have considered for transfer.”

1 Because Judge Teilborg is already familiar with the facts of this case and retained
2 jurisdiction to enforce the permanent injunction, judicial economy would favor
3 transfer of this case to Judge Teilborg.


4 Consequently, the parties request that CV-06-03066 be transferred to Judge
5 Teilborg so that it may be heard by him in conjunction with CV-02-1815.

6 Dated this 12th day of February 2007.

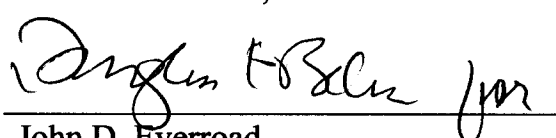
7 Peter M. de Jonge (Utah SBN 7184)
8 Gordon K. Hill (Utah SBN 9361)
9 THORPE, NORTH & WESTERN, LLP
10 8180 South 700 East, Suite 350
11 Sandy, Utah 84070

12 Mark M. Bettilyon (Utah SBN 4798)
13 Samuel C. Straight (Utah SBN 7638)
14 RAY QUINNEY & NEBEKER P.C.
15 36 South State Street, Suite 1400
16 Salt Lake City, Utah 84145-0385

17 JENNINGS, STROUSS & SALMON, P.L.C.

18 By 
19 Douglas F. Behm
20 The Collier Center, 11th Floor
21 201 East Washington Street
22 Phoenix, Arizona 85004-2385
23 Attorneys for Plaintiff Connor Sport
24 Court International, Inc.

25 FENNEMORE CRAIG, P.C.

26 By 
John D. Everroad
Ray K. Harris
3300 North Central Avenue, Suite 2600
Phoenix, Arizona 85012-2913
Attorneys for Defendants Rhino Sports,
Inc. and John E. Shaffer

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CERTIFICATE OF SERVICE

I hereby certify that on February 12, 2007, I electronically transmitted the attached document to the Clerk's Office using the CM/ECF System for filing and transmittal of a Notice of Electronic Filing to the following CM/ECF registrants:

- John D. Everroad: jeverroad@fclaw.com
- Ray K. Harris: rharris@fclaw.com
- Jamie A. Brown: jbrown@fclaw.com

COPY of the foregoing also mailed this date to:

Honorable James A. Teilborg
United States District Court of Arizona
Sandra Day O'Connor U.S. Courthouse, Suite 523
401 W. Washington St., SPC 51
Phoenix, AZ 85003-0001

Honorable Susan R. Bolton
United States District Court of Arizona
Sandra Day O'Connor U.S. Courthouse, Suite 522
401 W. Washington St., SPC 50
Phoenix, AZ 85003-0001

/s/ Denise L. Christiansen