

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
27
28

[Counsel listed on Signature Page]

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

ENERTRODE, INC.

Plaintiff,

v.

GENERAL CAPACITOR CO. LIMITED.,
JIANPING ZHENG aka JIM ZHENG, GENERAL
CAPACITOR INTERNATIONAL, INC.,
GENERAL CAPACITOR, LLC, AND DOES 1-100.

Defendants.

CASE NO. 3:16-cv-02458-HSG

**APPLICATION TO APPEAR AT
CASE MANAGEMENT
CONFERENCE BY TELEPHONE BY
COUNSEL FOR DEFENDANTS
GENERAL CAPACITOR CO.
LIMITED., JIANPING ZHENG aka
JIM ZHENG; GENERAL
CAPACITOR INTERNATIONAL,
INC., GENERAL CAPACITOR, LLC.**

Case Management Conference:

Date: February 28, 2017
Time: 2:00 p.m.
Courtroom: 10 (Hon. Haywood Gilliam)

G. Donovan Conwell, Jr., lead counsel for Defendants General Capacitor Co. Limited,
Jianping Zheng aka Jim Zheng; General Capacitor International, Inc.; and General Capacitor, LLC
(collectively "Defendants") hereby applies to this Court for permission to appear telephonically at
the Case Management Conference set for February 28, 2017 at 2:00 pm.

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
27
28

I. DISCUSSION

A. THE COURT CAN ALLOW ATTENDANCE AT THE CASE MANAGEMENT CONFERENCE BY TELEPHONE

The Court can permit a party to attend a case management conference by telephone. Adv. Comm. Note to 2015 Amendment to Fed. R. Civ. P. 16(b)(1)(B) ("The conference may be held in person, by telephone, or by more sophisticated electronic means."). See also Civil L.R. 16-10(a) in connection with initial case management conferences. ("Requests to participate in the conference by telephone must be filed and served at least 7 days before the conference...").

B. THERE IS GOOD CAUSE TO ALLOW COUNSEL TO APPEAR TELEPHONICALLY

There is good cause to allow Defendants' lead counsel to appear telephonically. Defendants' lead counsel's office (and residence) is in Tampa, Florida. Declaration of George Donovan Conwell, Jr., ¶ 2, filed concurrently herewith. While Defendants' lead counsel appeared in person for the recent Case Management Conference and Mediation Hearing, Defendants' lead counsel can effectively attend and meaningfully participate in the Case Management Conference, via telephone. Id. Defendants' lead counsel will have full authority to make decisions about any issue that may come up during the conference. Id. Additionally, co-counsel Perry J. Narancic, will appear in person at the Case Management Conference. Therefore, there will be no impact on the efficacy of the Conference and there is good cause to allow Defendants' lead counsel to appear telephonically.

II. CONCLUSION

For the foregoing reason, Defendants, respectfully requests that this Court grant the instant application.

1 Dated: February 17, 2017
2

3 By: /s/ Perry J. Narancic

4 Perry J. Narancic
5 Perry J. Narancic, SBN 206820
6 **LEXANALYTICA, PC**
7 2225 E. Bayshore Road, Suite 200
8 Palo Alto, CA 94303
9 www.lexanalytica.com
10 pjn@lexanalytica.com
11 Tel: 650-655-2800

12 G. Donovan Conwell, Jr.
13 Florida Bar No.: 0371319
14 **CONWELL BUSINESS LAW, LLLP**
15 12610 Race Track Road, Suite 200
16 Tampa, FL 33626
17 Tel. (813) 282-8000
18 Fax: (813) 855-2631
19 dconwell@ConwellBusinessLaw.com
20 eservice@ConwellBusinessLaw.com

21 Charles T. (Chris) Compton, SBN 56776
22 **COMPTON ANTITRUST LAW OFFICE**
23 3 Franciscan Ridge
24 Portola Valley, CA 94028
25 ctc.compton@gmail.com
26 Tel: 650-714-8556

27 Attorneys for all Counterclaimants
28 **GENERAL CAPACITOR CO. LIMITED.,**
GENERAL CAPACITOR INTERNATIONAL, INC.,
GENERAL CAPACITOR, LLC

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
27
28

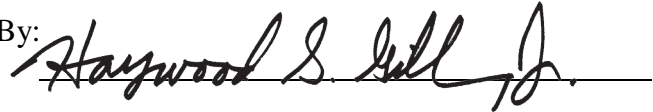
~~PROPOSED~~ ORDER

GOOD CAUSE appearing therefore, Defendants' counsel G. Donovan Conwell, Jr., lead counsel for Defendants General Capacitor Co. Limited, Jianping Zheng aka Jim Zheng; General Capacitor International, Inc.; and General Capacitor, LLC, may appear telephonically at the Case Management Conference set for February 28, 2017 at 2:00 pm. Counsel shall contact CourtCall at (866) 582-6878 to make arrangements for the telephonic appearance.

IT IS SO ORDERED.

DATE: 2/21/2017

By:



Hon. Haywood S. Gilliam, Jr.
United States District Judge