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13 **UNITED STATES DISTRICT COURT**
 14 **DISTRICT OF NEVADA**

15 BETHANY ANNE PENNINGTON,
 16

Case No. 2:15-cv-00949-RCJ-CWH

17 Plaintiff,

**DEFENDANT INTERNATIONAL
 HOUSE OF PANCAKES, LLC'S
 MOTION FOR JAMES C.
 GOODFELLOW TO APPEAR AT THE
 EARLY NEUTRAL EVALUATION BY
 TELEPHONE**

18 vs.

19 INTERNATIONAL HOUSE OF PANCAKES,
 LLC, a foreign Limited Liability Company;
 20 FARSHAD ASHOORI, an individual,
 RAINBOW 1606, INC., a Nevada corporation,
 doing business as IHOP; DOES I through X
 21 inclusive, and ROES CORPORATIONS XI
 through XX, inclusive,

22 Defendants.

23 Defendant International House of Pancakes, LLC (“IHOP”), by and through its attorneys,
 24 hereby submits its motion for leave to allow James C. Goodfellow to appear at the Early Neutral
 25 Evaluation by telephone. For the reasons set forth below, the Court should grant IHOP’s motion.

26
 27 1. The Court has set the Early Neutral Evaluation for Tuesday, November 10, 2015.
 28

1 2. IHOP LLC has submitted its statement in advance of the Early Neutral Evaluation.
2 P. Swenson Prior, IHOP LLC's local counsel, will appear in person.

3 3. In order to avoid additional costs, IHOP LLC respectfully requests that the Court
4 allow James C. Goodfellow, who has been admitted *pro hac vice*, to appear by telephone. Mr.
5 Goodfellow is located in Chicago.

6 4. IHOP LLC makes this request in good faith, and not to cause any undue difficulty
7 or delay.

8
9 WHEREFORE, IHOP LLC respectfully requests that the Court grant this motion and
10 allow Mr. Goodfellow to appear at the Early Neutral Evaluation by telephone.

11 **DATED: November 6, 2015**

12
13 Respectfully submitted,

14 INTERNATIONAL HOUSE OF PANCAKES, LLC

15 /s/ James C. Goodfellow

16 One of Its Attorney

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38 *Attorneys for Defendant International House of Pancakes, LLC*

IT IS SO ORDERED.


UNITED STATES MAGISTRATE JUDGE
DATED: 11-6-2015

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CERTIFICATE OF SERVICE

I, the undersigned, declare under penalty of perjury, that I am over the age of eighteen (18) years, and I am not a party to, nor interested in, this action. On this date, I caused to be served a true and correct copy of the foregoing _____ by the method indicated below:

- XXXXX Electronic Service (CM/ECF) _____ Federal Express
- _____ U.S. Mail _____ U.S. Certified Mail
- _____ Facsimile Transmission _____ Hand Delivery
- _____ Email Transmission _____ Overnight Mail

and addressed to the following:

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Joshua Santeramo, Esq.
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Attorneys for Plaintiff

DATED: November 6, 2015

/s/ James C. Goodfellow, Jr.
An Employee of SEYFARTH SHAW LLP

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