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15 *Attorneys for Plaintiff Mark Elliott*

16
 17 **UNITED STATES DISTRICT COURT**
DISTRICT OF NEVADA
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19 MARK ELLIOTT,
 20
 Plaintiff,
 21 vs.
 22 THE PRESCOTT COMPANIES, LLC dba
 PRESCOTT MANAGEMENT; OAKRIDGE
 23 INDUSTRIES, INC., DOES I-X and ROE
 CORPORATIONS I-X, inclusive,
 24
 Defendants.
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Case No. 2:15-cv-01143-APG-VCF

**PLAINTIFF'S UNOPPOSED MOTION
 FOR OUT OF STATE COUNSEL TO
 APPEAR BY TELEPHONE AT MOTION
 HEARING ON AUGUST 4, 2017**

26 Plaintiff Mark Elliott, by and through his attorneys of record, the law firm MAIER GUTIERREZ
 27 & ASSOCIATES, and hereby submits this Unopposed Motion for Out of State Counsel to Appear by
 28 Telephone at Motion Hearing on August 4, 2017, and in support thereof state as follows:


- 1 1. The Motion Hearing is currently scheduled for August 4, 2017, at 1:00 p.m. PST.
- 2 2. Plaintiff's lead counsels, Rafal Strzalkowski, Esq. and Amber Robinson, Esq., are both
- 3 located out-of-state, in Gainesville, Florida, and St. Petersburg, Florida, respectively.
- 4 3. Both of Plaintiff's lead counsels would incur significant costs to appear in person for the
- 5 Motion hearing.
- 6 4. To avoid these significant costs, Plaintiff requests that the Court permit Mr. Strzalkowski
- 7 and Ms. Robinson to appear and participate by telephone for the Motion Hearing.
- 8 5. Defendants' Counsel does not oppose this request.

9 WHEREFORE, Plaintiff respectfully requests the Court permit Mr. Strzalkowski and Ms. Robinson
10 to appear and participate in the Motion Hearing on August 4, 2017, by telephone.

11 DATED this 2nd day of August, 2017.

12 Respectfully submitted,

13 MAIER GUTIERREZ & ASSOCIATES

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15 _____
16 JOSEPH A. GUTIERREZ, ESQ.
17 Nevada Bar No. 9046
18 STEVEN G. KNAUSS, ESQ.
19 Nevada Bar No. 12242
20 *Attorneys for Plaintiff*

19 **IT IS SO ORDERED.**

20 
21 _____
22 **UNITED STATES DISTRICT JUDGE**

23 Magistrate

24 DATED: August 2, 2017

25 The call-in telephone number is (888)273-3658, access code: 3912597. The call must
26 be made five minutes prior to the hearing time. The court will join the call and
27 convene the proceedings. The call must be made on a land line. The use of a cell
28 phone or speaker phone during the proceedings is prohibited.

1 **CERTIFICATE OF SERVICE**

2 Pursuant to F.R.C.P. 5(b) and Electronic Filing Procedure IV(B), I certify that on the 2nd day
3 of August, 2017, a true and correct copy of the **PLAINTIFF'S UNOPPOSED MOTION FOR OUT**
4 **OF STATE COUNSEL TO APPEAR BY TELEPHONE AT MOTION HEARING ON**
5 **AUGUST 4, 2017**, was transmitted electronically through the Court's e-filing electronic notice
6 system to the attorney(s) associated with this case:

7
8 **WOOD, SMITH, HENNING & BERMAN LLC**
9 BROOKE A. BOHLKE, ESQ.
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13 *Attorney for Defendant Oakridge Industries, Inc.*

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19 *Attorney for Defendant The Prescott Companies*

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By: /s/ *Natalie Vazquez*
An Employee of MAIER GUTIERREZ & ASSOCIATES