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 19 *Pro Hac Vice*

20 UNITED STATES DISTRICT COURT
 21 DISTRICT OF NEVADA

22 STEPHAN CAMPBELL, *on behalf of*
 23 *himself and all others similarly situated,*
 24 Plaintiff,
 25 v.
 26 EVERYTHING BREAKS, INC.,
 27 Defendant.
 28

Case No.: 2:23-cv-00861-GMN-EJY
**MOTION TO CONVERT MAY 14,
 2024 HEARING ON PLAINTIFF’S
 MOTION TO COMPEL
 DISCOVERY RESPONSES TO
 VIDEOCONFERENCE; PROPOSED
 ORDER**

PLAINTIFF’S MOTION TO CONVERT MAY 15, 2024 HEARING ON PLAINTIFF’S MOTION TO COMPEL TO
 VIDEOCONFERENCE AND PERMITTING PLAINTIFF’S COUNSEL TO APPEAR REMOTELY
 CASE No. 2:23-CV-00861

1 **TO THE COURT, EACH PARTY AND THEIR ATTORNEY OF**
2 **RECORD:**

3 **PLEASE TAKE NOTICE** that pursuant to this Court’s procedures,
4 Plaintiff Stephan Campbell (“Plaintiff”), by and through his attorneys of record,
5 will and hereby does move this Honorable Court for an order converting the May
6 14, 2024 Hearing on Plaintiff’s Motion to Compel Discovery Responses to a
7 Videoconference hearing and permitting Plaintiffs’ Counsel (i.e., Craig Perry,
8 Chris R. Miltenberger and Max S. Morgan) to appear remotely at the hearing set to
9 occur on May 14, 2024 at 10:00 AM. ECF No. 33.

10 Plaintiff’s Co-Lead Counsel Chris Miltenberger is located in Southlake,
11 Texas (Dallas/Fort Worth Metroplex). Plaintiff’s Co-Lead Counsel Max Morgan
12 is located in Philadelphia, PA. Mr. Miltenberger intends to argue Plaintiff’s Motion
13 to Compel Discovery Responses at the May 14, 2024 hearing with the support of
14 Mr. Morgan. Travel to Las Vegas for Mr. Miltenberger would involve 7 hours
15 between travel to the airports, courthouse, and flight time. Costs would be over
16 \$700 for airfare and hotel. Travel to Las Vegas for Mr. Morgan would involve 8
17 hours between travel to the airports, courthouse, and flight time. Costs would be
18 over \$1,000 for airfare and hotel. On May 8, 2024, the Court granted Defense
19 Counsel’s request to appear remotely. The parties anticipate that a
20 videoconference appearance will likely only involve about 1 hour of time. Thus, to
21 appear in person at this hearing will be a substantial cost that may be reasonably
22 avoided by a video/Zoom or telephonic appearance for Mr. Miltenberger and Mr.
23 Morgan.

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28 PLAINTIFF’S MOTION TO CONVERT MAY 15, 2024 HEARING ON PLAINTIFF’S MOTION TO COMPEL
 TO VIDEOCONFERENCE AND PERMITTING PLAINTIFFS’ COUNSEL TO APPEAR REMOTELY

1 On May 7, 2024, Defense Counsel and Plaintiff's Counsel conferred and
2 Defense Counsel does not oppose Plaintiff's request for Plaintiff's Counsel to
3 appear remotely.

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6 Dated: May 8, 2024.

Respectfully submitted,

7
8 /s/ Chris R. Miltenberger

Chris R. Miltenberger, Esquire

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1 IT IS HEREBY ORDERED that the Motion to Convert the May 14, 2024
2 Hearing to Videoconference (ECF No. 37) is GRANTED.

3 IT IS FURTHER ORDERED that counsel for Plaintiff must contact Elvia
4 Garcia, courtroom deputy for the undersigned Magistrate Judge by **12:00 p.m. on**
5 **May 10, 2024, at Elvia_Garcia@nvd.uscourts.gov**, and provide their email
6 addresses. The courtroom deputy will email Mr. Miltenberger and Mr. Morgan the
7 Zoom link.

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10 
11 Elayna J. Youchak
12 U.S. Magistrate Judge

13 DATED: May 9, 2024
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TO VIDEOCONFERENCE AND PERMITTING PLAINTIFFS' COUNSEL TO APPEAR REMOTELY