

1 Now come Defendants United Government Security Officers of America, International
2 Union, and Local 283 (hereinafter "Union Defendants"), and hereby submit their Motion to
3 Excuse Attorney Kapitan from Attendance at the May 14, 2015 Status Conference. A discovery
4 status conference is currently scheduled for May 14, 2015 at 10 a.m. PST. Attorney Kapitan will
5 be in route to Reno, NV to attend his deposition scheduled for May 15, 2015. Attorney
6 Kapitan's flight will land at 11:39 a.m. on May 14, 2015. Due to this, and considering the facts
7 that Attorney Langton will be present to represent the Union Defendants, and that there are no
8 outstanding discovery disputes, Attorney Kapitan's excusal from attendance will not delay these
9 proceedings. Based on the foregoing, the Union Defendants respectfully request that Attorney
10 Kapitan be excused from attendance for the May 14, 2015 Status Conference.
11
12
13
14

15 Respectfully submitted,

16 /s/ Robert B. Kapitan
17 ROBERT B. KAPITAN
18 Ohio Reg. 0074327
19 8670 Wolff Court, Suite 210
20 Westminster, CO 80031
21 (303) 650-8515 - telephone
22 (303) 650-8510 - facsimile
23 rkapitan@ugsoa.com

24 MICHAEL LANGTON
25 Nevada Bar No. 0290
26 801 Riverside Drive
27 Reno, Nevada 89503
28 (775) 329-7557

25 **IT IS SO ORDERED**
26 *Thomas R. Foote*
27 **U.S. MAGISTRATE JUDGE**

28 **DATED:** May 13, 2015

Attorneys for the United
Government Security Officers
of America, International
Union and
United Government Security
Officers of America Local 283

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

CERTIFICATE OF SERVICE

I hereby certify that on this 13th day of May, 2015, this document(s) was filed through the CM/ECF system and will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF).

/s/ Robert B. Kapitan
Robert B. Kapitan