

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN MARIANAS ISLANDS**

DAVID J. RADICH and LI-RONG RADICH,)

Plaintiffs,)

v.)

Case No. 1:14-CV-20

JAMES C. DELEON GUERRERO, in his)

official capacity as Commissioner of the)

Department of Public Safety of the)

Commonwealth of Northern Marianas)

Islands,)

Defendant.)

**PLAINTIFFS' AGREED L.R.16.2CJ.e.1.(a) REQUEST TO APPEAR
TELEPHONICALLY**

Plaintiffs, DAVID J. RADICH and LI-RONG RADICH, by and through undersigned counsel, request that Plaintiffs' counsel, David G. Sigale, be granted leave to appear telephonically at the case management conference on October 31, 2014.

1. Attorney Sigale does not reside on the island of Saipan, and he does reside outside of Chicago, Illinois.

2. CNMI L.R.16.2CJ.e.1.(a) states, in relevant part:

Telephone Conferencing. Upon request (made at least one full calendar week prior to the hearing date) of any attorney who does not reside on the island of Saipan . . . the court, in its discretion, may hold by telephone the CMC and other conferences, and any scheduled argument on motions. Telephone conferencing is encouraged when that practice will save the attorneys, parties, or court time and money.

3. Though Attorney Sigale wishes to participate in all aspects of this litigation, it is neither feasible nor economical for him to appear in person at the case management conference on October 31, 2014.

4. Therefore, Attorney Sigale requests leave of this Court to appear telephonically on October 31, 2014. His local counsel, Daniel Guidotti, will also appear at the case management conference in person.

5. Counsel for the Defendant, James Zarones, has no objection to Attorney Sigale's Request.

WHEREFORE, the Plaintiffs, DAVID J. RADICH and LI-RONG RADICH, respectfully request this Honorable Court to grant their counsel, David G. Sigale, leave to appear at the October 31, 2014, case management conference telephonically, and to grant any and all further relief as this Court deems just and proper.

Dated: October 29, 2014

Respectfully submitted,

By: /s/ David G. Sigale
David G. Sigale

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