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Attorney for Plaintiffs

MARC J. RANDAZZA, JENNIFER RANDAZZA, and NATALIA RANDAZZA

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

| | | |
|---------------------------------------|---|-----------------------------------|
| MARC J. RANDAZZA, an individual, |) | Case No. 2:12-cv-02040-GMN-PAL |
| JENNIFER RANDAZZA, an individual, and |) | |
| NATALIA RANDAZZA, a minor, |) | MOTION FOR CASE MANAGEMENT |
| |) | CONFERENCE PURSUANT TO |
| Plaintiffs, |) | NEVADA LOCAL RULE 16-1(d) |
| |) | |
| vs. |) | |
| |) | |
| CRYSTAL COX, an individual, and ELIOT |) | |
| BERNSTEIN, an individual, |) | |
| |) | |
| Defendants. |) | |

Plaintiffs Marc J. Randazza, Jennifer Randazza, and Natalia Randazza, through counsel, hereby submit their Motion for Case Management Conference pursuant to LR 16-1(d).

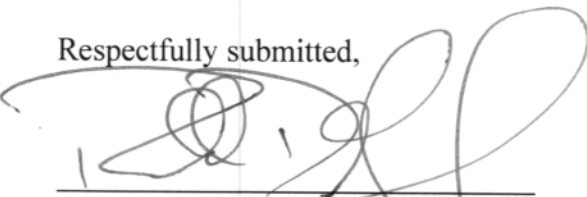
The parties have been unable to meet to conduct an early case conference pursuant to Fed. R. Civ. P. 26(f) because Defendant Crystal Cox refuses to speak with Plaintiffs' counsel via telephone or in person (See ECF No. 47 at 3; see also ECF No. 82). As a result, this case has not moved forward, and discovery has not commenced.

Local Rule 16-1 permits the Court to order a conference between the parties "to discuss the provisions of the discovery plan ... and such other matters as the Court deems appropriate." Plaintiffs therefore respectfully request that this Court enter an Order scheduling a Case Management Conference to address pending motions, discovery issues and establish a discovery

1 plan in order to prevent further prejudice to Plaintiffs due to Cox's refusal to abide by the rules of
2 this Court.

3
4 Dated: April 26, 2013

Respectfully submitted,



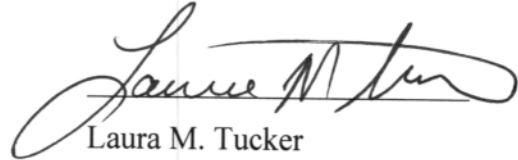
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CERTIFICATE OF SERVICE

Pursuant to the Federal Rules of Civil Procedure 5(b), I hereby certify that the foregoing document was filed using this Court's CM/ECF system on April 26, 2013.

Dated: April 26, 2013

Respectfully Submitted,



Laura M. Tucker

Law Clerk

ecf@randazza.com

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