

**UNITED STATES DISTRICT COURT**

for the

Middle District of Florida

SUNLUST PICTURES LLC

)

)

Plaintiff,

)

8:12-CV-01685-T35-MAP

v.

)

JOHN DOE

)

*Defendant*

)

**EMERGENCY MOTION TO APPEAR TELEPHONICALLY**

COMES NOW the law firm of Jonathan A Torres, LLC, and moves for entry of an Emergency Order allowing their attorney to appear telephonically for hearing on Defendant TUAN NGUYEN’S Omnibus Motion to Dismiss and, for good cause, would state as follows:

1. The law firm of Jonathan A Torres LLC is the attorney of record for Plaintiff, SUNLUST PICTURES, LLC, in the instant action.
2. That attorney Jonathan A. Torres will not be able to appear in person at the hearing on the motion on Tuesday, November 27, 2012, in the Sam Gibbons United States Courthouse, Tampa Florida Courtroom 10B at 10:00 a.m. before USDJ Mary S. Scriven, due to another hearing on Emergency Motion for Cancellation of Judicial Sale of the Subject Property Due to Prior Judicial Sale of Such Property in a Related Case No. 2011 CC 006763-O, on Tuesday, November 27, 2012 at 9:29 a.m. in Orange County, Orlando, Florida (see attached Exhibit “A”) and which inhibits such attorney from appearing properly in person to represent the Plaintiff.
3. That attorney Jonathan A. Torres hereby requests this honorable court grant an Emergency Order so that he can appear telephonically at Defendant TUAN NGUYEN’S OMNIBUS’ Motion to Dismiss, and to permit and allow said appearance be via telephone.
4. The motion is made in good faith and not for the purpose of delay.

WHEREFORE, the law firm of Jonathan A Torres, LLC, respectfully request this Honorable Court enter an Emergency Order allowing the law firm of Jonathan A Torres, LLC, to appear via telephone.

I HEREBY CERTIFY that on November 26, 2012, I electronically filed the foregoing using the ECF system which shall send an electronic copy and notification to all parties.

/s/Jonathan Torres

Jonathan Torres, Esquire

FBN: 0067287

Jonathan A. Torres, LLC

1417 North Semoran Boulevard, Suite 205

Orlando, FL 32807

Telephone: 407-953-5818

Facsimile: 407-898-9894

Attorney for Plaintiff

IN THE CIRCUIT COURT OF THE  
NINTH JUDICIAL CIRCUIT, IN AND  
FOR ORANGE COUNTY, FLORIDA

CASE NUMBER: 2008-CA-020993-O

INDYMAC BANK FSB;  
ONEWEST BANK FSB

Plaintiff(s),

vs.

MARK R SULAK, et al,

Defendant(s).

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**NOTICE OF HEARING**

This case is scheduled for a hearing on **EMERGENCY MOTION FOR CANCELLATION OF JUDICIAL SALE OF THE SUBJECT PROPERTY DUE TO PRIOR JUDICIAL SALE OF SUCH PROPERTY IN A RELATED CASE NO. 2011 CC 006763-O** on **November 27, 2012, at 9:29 am** Hearing Room 1100.01, Orange County Courthouse, 425 N. Orange Avenue, Orlando, Florida 32801.

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a copy of the above order was delivered to the below parties on this 20<sup>th</sup> day of November, 2012.

April Glover Harriott, Esquire	Law Office Of Marshall C Watson, PA 1800 Nw49th Street Suite120 Fort Lauderdale Fl 33309
Glenn T Vandewater, Esquire	1515 International Parkway, Ste 2031 Lake Mary Fl 32746
Frank Reder, Esquire	Law Offices Of Marshall C Watson, PA 1800 Nw 49th Street Suite 120 Ft Lauderdale Fl 33309
Jonathan Torres, Esquire	Attn Jonathan A Torres, LLC 1417 N Semoran Blvd Ste 205 Orlando Fl 32807
Indymac Federal Bank Fsb	c/o Pres VP or Officer Authority 888 E. Walnut St. Pasadena CA 91106

Elizabeth Ganley, Court Program Specialist