

1 **Joy Bertrand, Esq.**
PO Box 2734
2 Scottsdale, Arizona 85252-2734
Telephone: 480-656-3919
3 Fax: 480-361-4694
joyous@mailbag.com
4 www.joybertrandlaw.com
Arizona State Bar No. 024181

5 **ATTORNEY FOR: DEFENDANT**

6
7
8 **IN THE UNITED STATES DISTRICT COURT**
9 **FOR THE DISTRICT OF ARIZONA**

10 United States of America,
11 Plaintiff,
12
13 v.
14 James R. Parker.,
15 Defendant.

Case No. 10-CR-757-ROS-PHX

**MOTION FOR LEAVE TO APPEAR BY
PHONE**

16
17
18 NOW COMES the Defendant, by Attorney Joy Bertrand, to ask this Court for
19 leave to appear by phone at the July 26, 2010 Status Hearing in the above-named matter.

20 As further grounds therefore, the Defendant submits the following:

21
22 On July 21, 2010, Counsel agreed to join the Minns firm as local counsel for this
23 case. The Defendant is finalizing his representation arrangements with the Minns firm,
24 which Counsel expects will be complete within the next 30 days.

25
26 Counsel currently is working in Milwaukee, Wisconsin. Her work travel plans
27 require her to travel from Milwaukee to Los Angeles on July 27, 2010, for a July 28, 2010
28 mediation in *Hoshide v. Napolitano*, Central District of California Number 09CV1676.
29

1 Returning to Phoenix before that mediation would be expensive and time-consuming
2 for counsel. Therefore, if the Court would like new counsel for the Defendant to
3 participate in the July 26, 2010 Status Hearing, Counsel respectfully asks for leave to
4 appear by phone.
5

6 Alternatively, at this point, Counsel has no objection to the Government's
7 proposed scheduling order. Of course, Counsel reserves the right to petition the Court
8 to continue certain dates in the order if, upon review of the materials, Counsel
9 determines that additional time is needed.
10

11
12 RESPECTFULLY SUBMITTED on July 23, 2010.

13
14 s/Joy Bertrand
15 Joy Bertrand
16
17
18
19
20
21
22
23
24
25
26
27
28
29

1
2
3 **CERTIFICATE OF SERVICE**

4 On July 23, 2010, I, Joy Bertrand, filed this Motion for Leave to Appear by Phone
5 with the Arizona District Court's electronic filing system. Based on my training and
6 experience with electronic filing in the federal courts, it is my understanding that a copy
7 of this request will be electronically served upon opposing counsel, Peter Sexton, upon
8 its submission to the Court.
9
10

11
12 Respectfully submitted this 23rd day of July, 2010.
13

14
15 s/Joy Bertrand
16 Joy Bertrand
17
18
19
20
21
22
23
24
25
26
27
28
29

1 **Joy Bertrand, Esq.**
2 PO Box 2734
3 Scottsdale, Arizona 85252-2734
4 Telephone: 480-656-3919
5 Fax: 480-361-4694
6 joyous@mailbag.com
7 www.joybertrandlaw.com
8 Arizona State Bar No. 024181

9 **ATTORNEY FOR: DEFENDANT**

10 **IN THE UNITED STATES DISTRICT COURT**
11 **FOR THE DISTRICT OF ARIZONA**

12 United States of America,
13 Plaintiff,

14 v.

15 James R. Parker.,
16 Defendant.

Case No. 10-CR-757-ROS-PHX

ORDER

17
18 Per counsel's July 23, 2010 Motion, with good cause appearing, to wit: counsel's
19 pre-scheduled travel outside of Arizona, counsel's Motion for Leave to Appear by
20 Phone at the July 26, 2010 status conference is GRANTED.

21 DATED this _____ day of July, 2010.

22
23
24
25 _____
26 Roslyn O. Silver
27 District Court Judge
28
29