

IN THE UNITED STATES DISTRICT COURT FOR  
THE MIDDLE DISTRICT OF FLORIDA  
Tampa Division

ROBERT L. VAZZO, LMFT, individually )	
and on behalf of his patients, DAVID H. )	
PICKUP, LMFT, individually and on )	Civil Action No.: <u>8:17-cv-02896-CEH-AAS</u>
behalf of his patients, )	
)	
Plaintiffs, )	<b>INJUNCTIVE RELIEF SOUGHT</b>
)	
v. )	
)	
CITY OF TAMPA, FLORIDA, )	
)	
Defendant )	

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**UNOPPOSED MOTION TO CONDUCT  
CASE MANAGEMENT MEETING OF PARTIES TELEPHONICALLY  
AND REQUEST FOR EXPEDITED CONSIDERATION**

Pursuant to M.D. Fla. Local Rule 3.05, Plaintiffs, Robert L. Vazzo, LMFT, and David H. Pickup, LMFT, individually and on behalf of their patients (“Plaintiffs”), hereby move this Court for leave to conduct the Case Management Meeting of Parties telephonically.

1. On December 4, 2017, this Court issued the Track Two Notice (dkt. 4, “Notice”) requiring the Parties to participate in a Case Management Meeting, and to do so in person. (Dkt. 4, p. 9).

2. Counsel for Plaintiff maintain their principal office outside of the City of Tampa and would be required to travel long distances to participate in such conference in person.

3. Given the constraints of previously scheduled travel for extensive discovery, pretrial practice, and motion hearings in federal litigation in the Eastern District of New York, which has required lead counsel for Plaintiffs to spend over three weeks out of the office with additional travel required for all of next week, conducting the Case Management Meeting in person would be unduly burdensome on Plaintiffs.

4. Plaintiffs are confident that they can effectively and efficiently meet with Defendant's counsel via telephone to discuss and draft the Case Management Report.

5. Plaintiffs do not submit the instant motion for purposes of undue delay, and no party will be prejudiced by the granting of the relief requested herein.

6. Counsel for Plaintiffs conferred with Defendant's counsel prior to the filing of the instant motion, who indicated that Defendant does not object to the relief requested herein. The motion is therefore unopposed.

7. The parties have tentatively scheduled a telephonic meet and confer for this Friday, February 9, 2018. Accordingly, Plaintiffs respectfully request expedited consideration of this unopposed motion.

WHEREFORE, for good cause shown, Plaintiffs respectfully request that this Court grant leave to conduct in the Case Management Meeting of the parties telephonically.

Respectfully submitted,

/s/ Daniel J. Schmid  
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**CERTIFICATE OF SERVICE**

I hereby certify that on this 6th day of February, 2018, I caused a true and correct copy of the foregoing to be filed electronically with this Court. Service will be effectuated on all counsel of record via this Court's ECF/electronic service system.

/s/ Daniel J. Schmid

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