

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

| | |
|------------------------------|---------------------------------|
| NETSPHERE, INC., | § |
| MANILA INDUSTRIES, INC., and | § |
| MUNISH KRISHAN, | § |
| Plaintiffs. | § |
| | § Civil Action No. 3-09CV0988-F |
| v. | § |
| | § Motion for Expedited Relief |
| JEFFREY BARON, and | § |
| ONDOVA LIMITED COMPANY, | § |
| Defendants. | § |

**MOTION FOR LEAVE TO FILE: EXPEDITED MOTION TO RESET
APRIL 25 HEARING DATE**

TO THE HONORABLE JUDGE ROYAL FURGESON:

COMES NOW JEFF BARON, and moves this Court to grant leave to file the following expedited motion to reset the hearing currently set for April 25, 2011 because that date falls on the 21st day of Nisan, a religious day of observance for the undersigned counsel.

The undersigned counsel observes the religious holiday of Passover according to the lunar calendar. This year, the 15 and 16th of Nisan (Nisan is the first month of the Hebrew calendar, representing God’s freeing the Hebrew nation from slavery in Egypt) fall on the 19th and 20th of April. Those are the first two observed days of Passover. The 21st and 22nd of Nisan fall this year on the 25th and 26th days of April. Those are the second two observed days of Passover. As a matter of religious faith and observance, the undersigned is prohibited from working on those dates.

The undersigned has attempted to have another attorney fill in during the religious holiday. Primarily because they were concerned that they would be ordered to be counsel for all purposes without pay, as this Court has done to the undersigned, no attorney was willing to assist in appearing on this matter— as appears to be an intended or unintended purpose of the prior orders of the Court, to prevent Mr. Baron from being represented by experienced federal trial counsel.

The receiver has refused to agree to resetting the hearing date for their motion. This is the first time in all of the undersigned's years of practice that a movant has ever failed to extend the courtesy of making an agreed motion to reset a hearing falling on the Passover holiday, and has forced the undersigned to file a formal motion seeking such relief.

Respectfully submitted,

/s/ Gary N. Schepps

Gary N. Schepps
Texas State Bar No. 00791608
5400 LBJ Freeway, Suite 1200
Dallas, Texas 75240
(214) 210-5940 - Telephone
(214) 347-4031 - Facsimile
E-mail: legal@schepps.net
**COURT ORDERED TRIAL
COUNSEL FOR JEFF BARON**

CERTIFICATE OF SERVICE

This is to certify that this brief was served this day on all parties who receive notification through the Court's electronic filing system.

CERTIFICATE OF CONFERENCE

This is to certify that I contacted counsel for the receiver, and was unable to obtain their agreement to this motion.

CERTIFIED BY: /s/ Gary N. Schepps
Gary N. Schepps

VERIFICATION

DATED: April 18, 2011.

I declare under penalty of perjury that the cause for continuance stated in this motion is true and correct.

/s/ Gary N. Schepps
Gary N. Schepps