

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF WEST VIRGINIA
AT BECKLEY

CASE NO. 5:24-cv-00700

ANNA WHITE FERRARACCIO

Plaintiff

v.

NEW PEOPLE's BANK

Defendant

_____ /

**SCOTT M. BEHREN's UNOPPOSED MOTION FOR REMOTE APPEARANCE
AT COURT ORDERED SCHEDULING CONFERENCE**

Scott M. Behren, by and through his undersigned counsel, hereby requests this Court for an Order permitting the undersigned counsel to appear at court ordered scheduling conference by remote means and states as follows:

1. The undersigned counsel filed a Notice of Withdrawal in this matter pursuant to this Court's Local Rules.
2. This Court entered an Order on May 20, 2026, scheduling a scheduling conference for May 29, 2026 at 11:30 am in Beckley. (D.E. 56).
3. The undersigned counsel is a solo practitioner in South Florida. It would create a hardship for the undersigned to appear for this Scheduling Conference in person in Beckley. First, the undersigned is scheduled for Pretrial Conference and Pretrial Motions and all day depositions in a Palm Beach Circuit Court matter that is scheduled for jury trial the week of June 8, 2026. The case is styled *A Advantage Insurance Group, LLC*

v. Gregory Iuelle, Palm Beach Circuit Court Case No: 50-2023-CA-000835-XXXX-MB. It has taken great effort to get these matters scheduled.

4. Moreover, it would be a personal hardship to compel the undersigned to appear in person in West Virginia. It would require probably at least a two days of travel out of the office. In addition, the undersigned determined that, on short notice, such as this, the cost of a roundrip airplane ticket would be at least \$1000.00. All of this time and expense would be to attend what would presumably be a relatively short hearing.

5. The undersigned would respectfully request that I be permitted to appear at this Scheduling Conference by telephone or Zoom or some other electronic means. The undersigned would be able to coordinate a remote appearance with the other matters already scheduled on that date in Palm Beach, Florida.

6. The undersigned has conferred with opposing counsel and local counsel and neither oppose my remote appearance for said hearing.

WHEREFORE, Plaintiff respectfully requests that this Court permit the undersigned to appear at the court ordered Scheduling Conference by remote means and for any other relief this Court deems just and proper under the circumstances.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been e-mailed this 21st day of May 2026 : William S. Winfrey, Esq., 1608 W Main Street, P.O. Box 1159, Princeton, WV 24740.

Behren Law Firm
1930 N. Commerce Parkway-Suite 4
Weston, FL 33326
(954) 636-3802 - phone
(772) 252-3365 - fax
scott@behrenlaw.com

By:/Scott M. Behren/
Scott M. Behren
Fla Bar No. 987786

/s/ Robert P. Dunlap, II
Dunlap & Associates
WBSB #10012
345 Prince Street
Beckley, WV 25801
(304) 255 4762
Fax: (304) 255-4760
robertdunlapesq@gmail.com