

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF FLORIDA
(Miami Division)

WORLD MEDIA ALLIANCE LABEL
INC.

(Florida corporation)

Plaintiffs,

v.

ELLO ENTERTAINMENT GROUP,
LLC.,

(Wyoming company);

VAL SEGAL,

et al.

Defendants.

ACTION No. 1:23-CV-22933-ALTMAN

**PLAINTIFF'S EMERGENCY MOTION TO
AMEND PARAGRAPH 1 OF THE ORDER
OF THIS DATE**

Plaintiffs World Media Alliance Label Inc. ("WMA"), a Florida corporation, respectfully files an Emergency Motion to amend the Order entered in this case, Dkt 62, on March 21, 2024, earlier on this date.

The amendment that WMA seeks concerns Paragraph 1, where the Order states that the parties must meet again in person.

The undersigned is currently in Germany (Munich) in connection with an extradition matter of one U.S. citizen. The undersigned is a criminal defense counsel of record in his client's two criminal cases in the U.S. District Courts. The undersigned interacts with German attorneys and German authorities; at present the client is hospitalized and is awaited to be returned to an institution of preliminary detention. The obligation of the undersigned to be in Munich arose well before the status conference and today's Order. The German Court made a ruling, authorizing the

undersigned to undertake legal representation of the U.S. citizen and be allowed work visitation rights on a daily basis and other representation privileges.

For that reason, the plaintiffs and their counsel move, on an emergency basis, this honorable Court to allow the undersigned to be present at the joint meeting of the parties via Zoom or a comparable video connection. If the clients' presence in person is desirable and allowed, given the technical nature of many issues, the plaintiffs' executives will also attend the joint meeting in Miami Dade in person, while the undersigned attorney would have a parallel separate confidential communication line from Germany with them.

Prior to this filing, the undersigned had advised all other attorneys in this case about the undersigned's being on a legal work assignment in Germany and advised all other attorneys that the Motion was being filed today.

The present Motion is diligently filed on the same day under Eastern Standard Time as the Order was issued.

Dated: March 21, 2024.

Respectfully submitted,

_____/George Lambert/
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CERTIFICATE OF SERVICE.

The undersigned certifies that the foregoing was served by MC/ECF on the attorneys of Defendants as follows:

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Dated: March 21, 2024

/signed George Lambert/