

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF FLORIDA**

**Case No. 1:25-cv-23009-GAYLES**

TOHO CO., LTD.,

Plaintiff,

v.

THE INDIVIDUALS, CORPORATIONS,  
LIMITED LIABILITY COMPANIES,  
PARTNERSHIPS AND UNINCORPORATED  
ASSOCIATIONS IDENTIFIED IN  
SCHEDULE "A" HERETO,

Defendants.

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**PLAINTIFF'S MOTION FOR REMOTE APPEARANCE AT  
PRELIMINARY INJUNCTION HEARING**

Plaintiff, Toho Co., Ltd. ("Plaintiff"), by and through its undersigned counsel, respectfully moves this Court to enter an order allowing counsel to appear remotely, either telephonically or via videoconference, at the Thursday, October 2, 2025, Preliminary Injunction Hearing (the "Hearing").

On September 19, 2025, this Court granted Plaintiff's Temporary Restraining Order ("TRO"). [Dkt. No. 20]. On September 26, 2025, counsel for Plaintiff received from the third-party platforms contact information for Defendants and effectuated service of process. [Dkt. No. 23]. On September 19, 2025, this Court issued an Order as part of the Temporary Restraining Order setting the Preliminary Injunction motion briefing schedule and an in-person hearing for October 2, 2025, at 11:00 AM EST (the "Order") [Dkt. No. 20].

District courts have authority to manage their cases in an effort to conduct litigation efficiently. *See, e.g., Bethel v. Baldwin Cnty. Bd. of Edu.*, 371 F. App'x 57, 62 (11th Cir. 2010)

(finding district courts have inherent authority to provide for “the efficient disposition of litigation”); *see also Carson v. Polley*, 689 F.2d 562, 585 (5th Cir. 1982). Plaintiff’s counsel is located in St. Petersburg, FL, which is outside of the Southern District of Florida. All Defendants reside in the People’s Republic of China and are highly unlikely to attend an in-person hearing. Plaintiff will incur travel expenses for counsel to attend this in-person hearing and any Defendant appearing likely cannot attend in-person due to international travel and visa restrictions. In an effort to promote judicial efficiency and to conserve costs and expenses associated with this litigation, Plaintiff respectfully moves this Court for an Order granting a remote appearance either telephonically or by videoconference or by any means that should please the Court.

**WHEREFORE**, Plaintiff respectfully requests this Court grant Plaintiff’s Motion for Remote Appearance at the October 2, 2025, Preliminary Injunction hearing.

Dated: September 29, 2025

Respectfully Submitted,

By: /s/ William R. Brees  
William R. Brees (Bar No. 98886)  
william@bayramoglu-legal.com  
**BAYRAMOGLU LAW OFFICES LLC**  
1540 West Warm Springs, Suite 100  
Henderson, NV 89014  
Telephone: (702) 462-5973  
Fax: (702) 553-3404

*Attorneys for Plaintiff*

**CERTIFICATE OF SERVICE**

I, hereby certify that on the 29th day of September 2025, I electronically filed the foregoing document with the clerk of the court using the electronic case filing system of the court. The electronic case filing system sent a “Notice of Electronic Filing” to the attorneys of record who have consented to accept this Notice as service of this document by electronic means. Notice of this filing is provided to unrepresented parties for whom contact information is listed below and has been provided via email and by posting the filing on a URL contained on our website <http://blointernetenforcement.com>, and a link to said website in the email provided by third-party.

*/s/ William R. Brees*  
WILLIAM R. BREES (FL BAR NO. 98886)  
**BAYRAMOGLU LAW OFFICES LLC**

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**[PROPOSED] ORDER GRANTING MOTION FOR  
REMOTE APPEARANCE AT PRELIMINARY INJUNCTION HEARING**

Before the Court is Plaintiff's Motion for Remote Appearance at Preliminary Injunction Hearing (the "Motion") that requests a Court Order authorizing the remote appearance at the Preliminary Injunction Hearing on October 2, 2025 at 11:00 A.M. EST.

It is hereby **ORDERED** that Plaintiff's Motion for Remote Appearance at the Preliminary Injunction Hearing is **GRANTED**.

DATED: \_\_\_\_\_, 2025

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HONORABLE DARRIN P. GAYLES  
UNITED STATES MAGISTRATE JUDGE