

1 DAVID SILVER, ESQ. (California Bar No. 312445)
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3 **BAYRAMOGLU LAW OFFICES LLC**
4 1540 West Warm Springs Road, Suite 100
5 Henderson, NV 89014
6 Telephone: 702.462.5973
7 Facsimile: 702.553.3404
8 *Attorneys for Plaintiff*

9 **UNITED STATES DISTRICT COURT**
10 **NORTHERN DISTRICT OF CALIFORNIA**
11 **SAN JOSE DIVISION**

12 ASTRAL IP ENTERPRISE LTD.,
13 Plaintiff,
14 v.
15 HORIZONMATRIX,
16 Defendant.

Case No. 5:24-cv-07428-EJD

**ADMINISTRATIVE REQUEST TO
APPEAR TELEPHONICALLY OR
VIA ZOOM AT HEARING ON
PLAINTIFF’S MOTION FOR
DEFAULT JUDGMENT**

Hearing Date: January 22, 2026
Hearing Time: 9:00 AM PST

17 **TO THE HONORABLE COURT AND ALL PARTIES AND THEIR**
18 **RESPECTIVE COUNSEL OF RECORD:**

19 PLEASE TAKE NOTICE that pursuant to Civil Local Rule 7-11 and Section
20 IV(G) of the Court’s Standing Order for Civil Cases, Counsel for Plaintiff ASTRAL
21 IP ENTERPRISES LTD., (“Plaintiff”), respectfully requests to be permitted to appear
22 remotely at the upcoming Hearing on Plaintiff’s Motion for Default Judgment (the
23 “Motion”) currently scheduled for January 22, 2026 at 9:00 AM PST before the
24 Honorable Edward J. Davila in Courtroom 4, 5th floor of the San Jose Courthouse
25 (the “Hearing”).
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1 Counsel for Plaintiff can effectively participate at the Hearing by telephone or
2 video conference and no party will suffer prejudice as a result. This Request is made
3 with good cause on the grounds that counsel resides in Las Vegas, Nevada and
4 traveling to the in-person hearing would result in undue cost and burden on Plaintiff.

5 Counsel for Plaintiff recently suffered a herniated disc in his back and has a
6 toddler at home to look after, making travel physically painful and logistically
7 difficult. Counsel acknowledges the Court will not generally grant such requests by
8 the moving party, but hopes that the Court will be willing to grant the remote
9 appearance under the current circumstances.

10 For these reasons, Plaintiff’s counsel respectfully requests that the Court allow
11 counsel to appear remotely at the Hearing on January 22, 2026.

12
13 DATED: January 14, 2026

Respectfully submitted,

14 By: /s/ David Silver
15 DAVID SILVER, ESQ.
16 (California Bar No. 312445)
17 David@bayramoglu-legal.com
18 **BAYRAMOGLU LAW OFFICES LLC**
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20 Henderson Nevada 89014
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Attorney for Plaintiff

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CERTIFICATE OF SERVICE

I, hereby certify that on January 14, 2026, I electronically filed the foregoing with the Court using the CM/ECF system, and thereby delivered the foregoing by electronic means to all counsel of record.

DATED: January 14, 2026

Respectfully submitted,

By: /s/ David Silver
DAVID SILVER, ESQ.
BAYRAMOGLU LAW OFFICES LLC

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8 *Attorneys for Plaintiff*

9 **UNITED STATES DISTRICT COURT**
10 **NORTHERN DISTRICT OF CALIFORNIA**
11 **SAN JOSE DIVISION**

12 ASTRAL IP ENTERPRISE LTD.,

13 Plaintiff,

14 v.

15 HORIZONMATRIX,

16 Defendant.

Case No. 5:24-cv-07428-EJD

**DECLARATION OF DAVID
SILVER IN SUPPORT OF
ADMINISTRATIVE REQUEST
TO APPEAR TELEPHONICALLY
OR VIA ZOOM AT HEARING ON
PLAINTIFF’S MOTION FOR
DEFAULT JUDGMENT**

Hearing Date: January 22, 2026
Hearing Time: 9:00 AM PST

17 I, David Silver, of Las Vegas, NV declare as follows:

18 1. Except as otherwise expressly stated to the contrary, this declaration is
19 based upon my personal knowledge of the following facts and, if called as a witness,
20 I could and would competently testify to the statements made herein.

21 2. I provide this declaration in support of Plaintiff’s Administrative Motion
22 to Appear Telephonically or Via Zoom at the upcoming Hearing on Plaintiff’s
23 Motion to for Default Judgment (the “Motion”) currently scheduled for January 22,
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1 2026, at 9:00 AM PST before the Honorable Edward J. Davila in Courtroom 4, 5th
2 floor of the San Jose Courthouse (the “Hearing”).

3 3. I am an attorney duly admitted to practice before this Court and I am
4 lead counsel for Plaintiff, ASTRAL ENTERPRISE LTD., (“Plaintiff”) in the above-
5 captioned matter.

6 4. I reside in Las Vegas, NV. Plaintiff respectfully requests its Counsel be
7 allowed to appear remotely at the Hearing on January 22, 2026, at 9:00 AM PST,
8 through video or telephonic conference at the Court’s discretion.

9 5. On January 4, 2026, I injured my back, which worsened overnight and
10 culminated with me being unable to walk and being taken by ambulance to the
11 hospital the morning of January 5, 2026. An MRI revealed a herniated disc pressing
12 on the nerve between my L5 and S1 vertebrae. I was able to be discharged on January
13 6, 2026, but currently ambulate with a walker.

14 6. I also have a toddler at home that is not quite two years old yet. While I
15 have assistance during the day, I am primarily taking care of him in the evenings and
16 nights. Traveling for the hearing would create logistical difficulties and result in
17 unnecessary personal expenses that could be avoided with a remote appearance.

18 7. I have an office space at home and am able to work and attend hearings
19 in my office. I will not have difficulties appearing remotely for the Hearing.

20 I declare under the penalty of perjury under the laws of the United States of
21 America that the foregoing is true and correct.

22 Executed on January 14, 2026, in Las Vegas, NV.

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24 Respectfully submitted,

25 By: /s/ David Silver
26 DAVID SILVER, ESQ.

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DATED: January 14, 2026

Respectfully submitted,

By: /s/ David Silver
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BAYRAMOGLU LAW OFFICES LLC

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9 **UNITED STATES DISTRICT COURT**
10 **NORTHERN DISTRICT OF CALIFORNIA**
11 **SAN JOSE DIVISION**

Case No. 5:24-cv-07428-EJD

12 ASTRAL IP ENTERPRISE LTD.,

13 Plaintiff,

14 v.

15 HORIZONMATRIX,

16 Defendant.

**[PROPOSED] ORDER GRANTING
ADMINISTRATIVE REQUEST TO
APPEAR TELEPHONICALLY OR
VIA ZOOM AT HEARING ON
PLAINTIFF’S MOTION FOR
DEFAULT JUDGMENT**

Hearing Date: January 22, 2026
Hearing Time: 9:00 AM PST

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19 Counsel for Plaintiff ASTRAL IP ENTERPRISES LTD., (“Plaintiff”), filed a
20 request to be permitted to appear remotely at the upcoming Hearing on Plaintiff’s
21 Motion for Default Judgment, currently scheduled for January 22, 2026, at 9:00 AM
22 PST before the Honorable Eward J. Davila in Courtroom 4, 5th floor of the San Jose
23 Courthouse (the “Request”). After reviewing the Request and the accompanying
24 record, the Court **GRANTS** Defendant’s Request.
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1 **IT IS HEREBY ORDERED** that counsel is permitted to attend the Hearing on
2 January 22, 2026, at 9:00 AM PST via remote means.

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DATED: _____

HONORABLE EDWARD J. DAVILA
UNITED STATES DISTRICT JUDGE

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DATED: January 14, 2026

Respectfully submitted,

By: /s/ David Silver
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