

JOHN PETER LEE, LTD.
ATTORNEYS AT LAW
830 LAS VEGAS BLVD. SOUTH
LAS VEGAS, NEVADA 89101
Telephone (702) 382-4044
Telecopier (702) 383-9950

1 **MWCN**
JOHN PETER LEE, LTD.
2 JOHN PETER LEE, ESQ.
Nevada Bar No. 001768
3 JOHN C. COURTNEY, ESQ.
Nevada Bar No. 011092
4 830 Las Vegas Boulevard South
Las Vegas, Nevada 89101
5 (702) 382-4044 Fax: (702) 383-9950
e-mail: info@johnpeterlee.com
6 Attorneys for Defendant
Reza Zandian aka Golamreza Zandianjazi
7 *aka Gholamreza Zandianjazi aka Gholam Reza Zandian*
aka Reza Jazi aka J. Reza Jazi aka G. Reza Jazi aka
8 *Ghononreza Zandian Jazi*

9 **IN THE FIRST JUDICIAL DISTRICT COURT OF THE STATE OF NEVADA**
10 **IN AND FOR CARSON CITY**

11 JED MARGOLIN, an individual;
12
13 Plaintiff,

Case No.: 090C00579
Dept. No.: I

14 vs.

15 OPTIMA TECHNOLOGY CORPORATION,
a California corporation, OPTIMA
16 TECHNOLOGY CORPORATION, a Nevada
corporation, REZA ZANDIAN aka
17 GOLAMREZA ZANDIANJAZI aka
GHOLAM REZA ZANDIAN aka REZA
18 JAZI aka J. REZA JAZI AKA G. REZA JAZI
aka GHONONREZA ZANDIAN JAZI, an
19 individual, DOE Companies 1-10; DOE
Corporations 11-20, and DOE Individuals 21-
20 30,

Defendants.

1334.023382-td

21 **JOHN PETER LEE, LTD.'S MOTION TO WITHDRAW FROM REPRESENTATION**
22 **OF DEFENDANT REZA ZANDIAN aka GOLAMREZA ZANDIANJAZI aka GHOLAM**
23 **REZA ZANDIAN aka REZA JAZI aka J. REZA JAZI AKA G. REZA JAZI aka**
GHONONREZA ZANDIAN JAZI

24 COMES NOW, the law firm of JOHN PETER LEE, LTD., (the Firm) and moves this
25 Honorable Court for an Order to Withdraw from representation of Defendant REZA ZANDIAN aka
26 GOLAMREZA ZANDIANJAZI aka GHOLAM REZA ZANDIAN aka REZA JAZI aka J. REZA
27 JAZI AKA G. REZA JAZI aka GHONONREZA ZANDIAN JAZI. This Motion is made pursuant
28 to EDCR 7.40(b)(2). This Motion is based upon the following Points and Authorities, all pleadings
and papers on file herein, and the Affidavit of counsel attached hereto.

JM_FJD_0933

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NOTICE OF MOTION

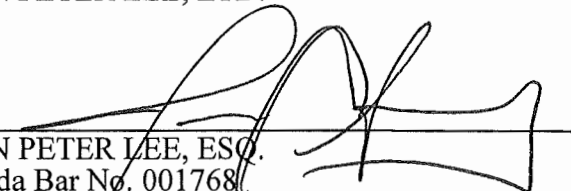
TO: JED MARGOLIN, Plaintiff;

TO: MATTHEW D. FRANCIS, ESQ., and ADAM P. MCMILLEN, Attorneys for Plaintiff;

YOU WILL PLEASE TAKE NOTICE that the undersigned will bring the foregoing JOHN PETER LEE, LTD.'S MOTION TO WITHDRAW FROM REPRESENTATION OF DEFENDANT REZA ZANDIAN aka GOLAMREZA ZANDIANJAZI aka GHOLAM REZA ZANDIAN aka REZA JAZI aka J. REZA JAZI AKA G. REZA JAZI aka GHONONREZA ZANDIAN JAZI on for hearing before the above entitled Court on the _____ day of _____, 2012, at the hour of ___:00 __.m. of said date, in Department XIX or as soon thereafter as Counsel can be heard.

DATED this 6th day of March, 2012.

JOHN PETER LEE, LTD.

BY: 

JOHN PETER LEE, ESQ.
Nevada Bar No. 001768
JOHN C. COURTNEY, ESQ.
Nevada Bar No. 011092
830 Las Vegas Boulevard South
Las Vegas, Nevada 89101
Ph: (702) 382-4044
Attorneys for Defendant
Reza Zandian aka Golamreza Zandianjazi aka Gholamreza Zandianjazi aka Gholam Reza Zandian aka Reza Jazi aka J. Reza Jazi aka G. Reza Jazi aka Ghononreza Zandian Jazi

DECLARATION OF COUNSEL
IN SUPPORT OF JOHN PETER LEE, LTD.'S MOTION TO WITHDRAW FROM REPRESENTATION OF DEFENDANT REZA ZANDIAN aka GOLAMREZA ZANDIANJAZI aka GHOLAM REZA ZANDIAN aka REZA JAZI aka J. REZA JAZI AKA G. REZA JAZI aka GHONONREZA ZANDIAN JAZI

STATE OF NEVADA)
) ss:
COUNTY OF CLARK)

JOHN C. COURTNEY, ESQ., states the following under the penalty of perjury:

1. Declarant has personal knowledge of the matters stated herein, except as to those matters stated upon information and belief, and as to such matters, believes such matters to be true

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1 and is competent to testify to the same. Declarant is an attorney licensed to practice law in Nevada
2 and is an associate attorney with the law firm of John Peter Lee, Ltd., which represents REZA
3 ZANDIAN aka GOLAMREZA ZANDIANJAZI aka GHOLAMREZA ZANDIAN aka REZA JAZI
4 aka J. REZA JAZI AKA G. REZA JAZI aka GHONONREZA ZANDIAN JAZI.

5 2. The law firm of John Peter Lee, Ltd., and all of its attorneys, hereby seek to withdraw
6 as attorneys of record for REZA ZANDIAN aka GOLAMREZA ZANDIANJAZI aka GHOLAM
7 REZA ZANDIAN aka REZA JAZI aka J. REZA JAZI AKA G. REZA JAZI aka GHONONREZA
8 ZANDIAN JAZI. Declarant files John Peter Lee, Ltd.'s Motion to Withdraw from Representation
9 of REZA ZANDIAN aka GOLAMREZA ZANDIANJAZI aka GHOLAM REZA ZANDIAN aka
10 REZA JAZI aka J. REZA JAZI AKA G. REZA JAZI aka GHONONREZA ZANDIAN JAZI.

11 3. To the best of Declarant's knowledge and belief the last known address and telephone
12 number at which Plaintiffs may be served or reached with notice of further proceedings taken in this
13 action is:

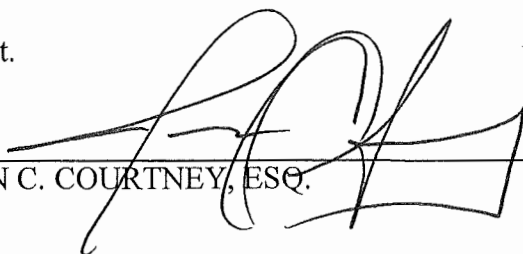
14 Reza Zandian
15 8775 Costa Verde Blvd.
16 San Diego, California 92122

17 4. The primary reason for requesting withdrawal is that the client no longer wishes to
18 pay fees to John Peter Lee, Ltd. for services rendered, or to be rendered, in the instant case.

19 5. There are also other reasons that the instant motion to withdraw as counsel is made;
20 however, Declarant does not wish to state said other reasons unless specifically compelled by the
21 Court, particularly because Declarant does not wish to reveal any more attorney-client privileged
22 information than that which is absolutely necessary in order for the Court to grant the instant motion
23 for withdrawal as counsel.

24 6. This Declaration is made in good faith.

25 FURTHERMORE, Declarant sayeth naught.

26 
27 _____
28 JOHN C. COURTNEY, ESQ.

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POINTS AND AUTHORITIES

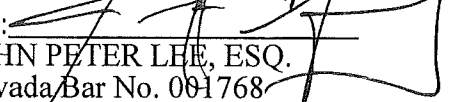
Pursuant to EDCR 7.40(b)(2)(ii), Counsel in any case may be changed only ... (2) When no attorney has been retained to replace the attorney withdrawing, by order of the court, granted upon written motion, and

(i) If the application is made by the attorney, the attorney must include in an affidavit the address, or last known address, at which the client may be served with notice of further proceedings taken in the case in the event the application for withdrawal is granted, and the telephone number, or last known telephone number, at which the client may be reached and the attorney must serve a copy of the application upon the client and all other parties to the action or their attorneys.

Pursuant to the above statutes and case law, John Peter Lee, Ltd. requests this Court for leave to withdraw as counsel for Defendant REZA ZANDIAN aka GOLAMREZA ZANDIANJAZI aka GHOLAM REZA ZANDIAN aka REZA JAZI aka J. REZA JAZI AKA G. REZA JAZI aka GHONONREZA ZANDIAN JAZI, as the Firm has complied with the requirements of the local rule for withdrawal, as attached and incorporated herein in the Declarant of counsel, John C. Courtney, Esq., setting forth the grounds for the Firm's Motion.

DATED this 6th day of March, 2012.

JOHN PETER LEE, LTD.

BY: 
JOHN PETER LEE, ESQ.
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JOHN C. COURTNEY, ESQ.
Nevada Bar No. 011092
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Attorneys for Defendant
*Reza Zandian aka Golamreza Zandianjazi
aka Gholamreza Zandianjazi aka Gholam Reza
Zandian aka Reza Jazi aka J. Reza Jazi aka G. Reza
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CERTIFICATE OF MAILING

I HEREBY CERTIFY that on the 17th day of March, 2012, I served a copy of the above and foregoing JOHN PETER LEE, LTD.'S MOTION TO WITHDRAW FROM REPRESENTATION OF DEFENDANT REZA ZANDIAN aka GOLAMREZA ZANDIANJAZI aka GHOLAM REZA ZANDIAN aka REZA JAZI aka J. REZA JAZI AKA G. REZA JAZI aka GHONONREZA ZANDIAN JAZI, upon the appropriate parties hereto, by enclosing it in a sealed envelope, deposited in the United States mail, upon which first class postage was fully prepaid addressed to:

Matthew D. Francis
Adam P. McMillen
WATSON & ROUNDS
5371 Kietzke Lane
Reno, Nevada 89511


An Employee of JOHN PETER LEE, LTD.