

JOHN PETER LEE, LTD

ATTORNEYS AT LAW

JM\_FJD\_0947

CORPORATION, A NEVADA CORPORATION: AND REZA ZANDIAN aka GOLAMREZA 1 2 ZANDIANJAZI aka GHOLAM REZA ZANDIAN aka REZA JAZI aka J. REZA JAZI AKA G. 3 REZA JAZI aka GHONONREZA ZANDIAN JAZI.

4 This Motion is made pursuant to EDCR 7.40(b)(2). This Motion is based upon the 5 following Points and Authorities, all pleadings and papers on file herein, and the Affidavit of counsel attached hereto. 6

## **NOTICE OF MOTION**

TO: JED MARGOLIN, Plaintiff;

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9 MATTHEW D. FRANCIS, ESQ., and ADAM P. MCMILLEN, Attorneys for Plaintiff: TO: 10 YOU WILL PLEASE TAKE NOTICE that the undersigned will bring the foregoing JOHN PETER LEE, LTD.'S AMENDED MOTION TO WITHDRAW FROM REPRESENTATION OF 11 12 DEFENDANTS OPTIMA TECHNOLOGY CORPORATION, A CALIFORNIA CORPORATION: 13 OPTIMA TECHNOLOGY CORPORATION, A NEVADA CORPORATION: AND REZA ZANDIAN aka GOLAMREZA ZANDIANJAZI aka GHOLAM REZA ZANDIAN aka REZA JAZI 14 15 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, 16 at the hour of :00 .m. of said date, in Department XIX or as soon thereafter as Counsel can be 17 18 heard. DATED this  $(3^{\text{H}})$  day of March, 2012. 19 JOHN PETER LEE, LAT 20 BY: 21 JOHN PETER LÆE, ESC Nevada Bar No. 001768 22 JOHN C. COURTNEY, ESQ. Nevada Bar No. 011092 23 830 Las Vegas Boulevard South Las Vegas, Nevada 89101 24 Ph: (702) 382-4044 Attorneys for Defendants 25

**JOHN PETER LEE. LTI** ATTORNEYS AT LAW LAS VEGAS, NEVADA 830 LAS VEGAS BLVD.

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Optima Technology Corporation, Optima Technology Corporation, and

Jazi aka Ghononreza Zandian Jazi

Reza Zandian aka Golamreza Zandianjazi aka Gholamreza Zandianjazi aka Gholam Reza

Zandian aka Reza Jazi aka J. Reza Jazi aka G. Reza

JM FJD 0948

1 DECLARATION OF COUNSEL IN SUPPORT OF JOHN PETER LEE, LTD.'S AMENDED MOTION TO WITHDRAW 2 FROM REPRESENTATION OF DEFENDANTS OPTIMA TECHNOLOGY, A CALIFORNIA CORPORATION: OPTIMA TECHNOLOGY CORPORATION. A NEVADA CORPORATION; AND REZA ZANDIAN aka\_GOLAMREZA ZANDIANJAZI 3 <u>aka GHOLAM REZA ZANDIAN aka REZA JAZI aka J. REZA JAZI AKA G. REZA</u> 4 JAZI aka GHONONREZA ZANDIAN JAZI 5 STATE OF NEVADA ) ss: 6 COUNTY OF CLARK 7 JOHN C. COURTNEY, ESQ., states the following under the penalty of perjury: 8 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 9 10 and is competent to testify to the same. Declarant is an attorney licensed to practice law in Nevada 11 and is an associate attorney with the law firm of John Peter Lee, Ltd., which represents OPTIMA 12 TECHNOLOGY, A CALIFORNIA CORPORATION; OPTIMA TECHNOLOGY CORPORATION, A NEVADA CORPORATION; AND REZA ZANDIAN aka GOLAMREZA 13 ZANDIANJAZI aka GHOLAM REZA ZANDIAN aka REZA JAZI aka J. REZA JAZI AKA G. 14 15 REZA JAZI aka GHONONREZA ZANDIAN JAZI. 16 2. The law firm of John Peter Lee, Ltd., and all of its attorneys, hereby seek to withdraw as attorneys of record for OPTIMA TECHNOLOGY, A CALIFORNIA CORPORATION; OPTIMA 17 18 TECHNOLOGY CORPORATION, A NEVADA CORPORATION; AND REZA ZANDIAN aka GOLAMREZA ZANDIANJAZI aka GHOLAM REZA ZANDIAN aka REZA JAZI aka J. REZA 19 20 JAZI AKA G. REZA JAZI aka GHONONREZA ZANDIAN JAZI. Declarant files JOHN PETER 21 LEE, LTD.'S AMENDED MOTION TO WITHDRAW FROM REPRESENTATION OF 22 DEFENDANTS OPTIMA TECHNOLOGY, A CALIFORNIA CORPORATION: OPTIMA 23 TECHNOLOGY CORPORATION, A NEVADA CORPORATION; AND REZA ZANDIAN aka GOLAMREZA ZANDIANJAZI aka GHOLAM REZA ZANDIAN aka REZA JAZI aka J. REZA 24 JAZI AKA G. REZA JAZI aka GHONONREZA ZANDIAN JAZI. 25 26 . . . 27 28 . . .

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1	3. To the best of Declarant's knowledge and belief the last known address and telephone
2	number at which Plaintiffs may be served or reached with notice of further proceedings taken in this
3	action is:
4	Reza Zandian 2775 Gente Mande Dlad
5	8775 Costa Verde Blvd. San Diego, California 92122
6	4. The primary reason for requesting withdrawal is that the client no longer wishes to
7	pay fees to John Peter Lee, Ltd. for services rendered, or to be rendered, in the instant case.
8	5. There are also other reasons that the instant motion to withdraw as counsel is made;
9	however, Declarant does not wish to state said other reasons unless specifically compelled by the
10	Court, particularly because Declarant does not wish to reveal any more attorney-client privileged
11	information than that which is absolutely necessary in order for the Court to grant the instant motion
12	for withdrawal as counsel.
13	6. This Declaration is made in good faith.
14	FURTHERMORE, Declarant sayeth naught.
15 16	JOHN C. COURTNEY, ESQ.
10	JOINT C. COORTINEN, ESQ.
18	DOINTS AND AUTHODITIES
19	POINTS AND AUTHORITIES
20	Pursuant to EDCR 7.40(b)(2)(ii), Counsel in any case may be changed only (2) When no
21	attorney has been retained to replace the attorney withdrawing, by order of the court, granted upon
22	written motion, and
23	(i) If the application is made by the attorney, the attorney must include in an affidavit the address, or last known address, at which
24	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 taken have number, on last known taken are number, at which the
25	telephone number, or last known telephone number, at which the client may be reached and the attorney must serve a copy of the suplication upon the client and all other particulate to the action on their
26	application upon the client and all other parties to the action or their attorneys.
27	Pursuant to the above statutes and case law, John Peter Lee, Ltd. requests this Court for leave
28	to withdraw as counsel for Defendants OPTIMA TECHNOLOGY, A CALIFORNIA
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1	CORPORATION; OPTIMA TECHNOLOGY CORPORATION, A NEVADA CORPORATION;
2	AND REZA ZANDIAN aka GOLAMREZA ZANDIANJAZI aka GHOLAM REZA ZANDIAN
3	aka REZA JAZI aka J. REZA JAZI AKA G. REZA JAZI aka GHONONREZA ZANDIAN JAZI,
4	as the Firm has complied with the requirements of the local rule for withdrawal, as attached and
5	incorporated herein in the Declarant of counsel, John C. Courtney, Esq., setting forth the grounds
6	for the Firm's Motion.
7	DATED this $\int \frac{24}{2}$ day of March, 2012.
8	JOHN PETER LEE, LTD
9	BY:
10 11	JOHN PETER LEE, ESO Nevada Bar No. 001768
12	JOHN C. CØURTNEY, ESQ. Nevada Bar No. 011092
13	830 Las Vegas Boulevard South Las Vegas, Nevada 89101
14	Ph: (702) 382-4044/Fax: (702) 383-9950 Attorneys for Defendants
15	Optima Technology Corporation, Optima Technology Corporation, and
16	Reza Zandian aka Golamreza Zandianjazi aka Gholamreza Zandianjazi aka Gholam Reza
17	Zandian aka Reza Jazi aka J. Reza Jazi aka G. Reza Jazi aka Ghononreza Zandian Jazi
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## **CERTIFICATE OF MAILING**

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1	CERTIFICATE OF MAILING	
2	I HEREBY CERTIFY that on theday of March, 2012, I served a copy of the above and	
3	foregoing JOHN PETER LEE, LTD.'S AMENDED MOTION TO WITHDRAW FROM	
4	REPRESENTATION OF DEFENDANTS OPTIMA TECHNOLOGY CORPORATION, A	
5	CALIFORNIA CORPORATION; OPTIMA TECHNOLOGY CORPORATION, A NEVADA	
6	CORPORATION; AND 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, upon the appropriate parties hereto, by enclosing it in a sealed envelope, deposited	
9	in the United States mail, upon which first class postage was fully prepaid addressed to:	
10	Matthew D. Francis Adam P. McMillen	
11	WATSON & ROUNDS 5371 Kietzke Lane	
12	Reno, Nevada 89511	
13	AMOU	
14	An Employee of JOHN PETER LEE, LTD.	
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