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1 MWCN
2 JOHN PETER LEE, LTD.
3 JOHN PETER LEE, ESQ.
4 Nevada Bar No. 001768
5 JOHN C. COURTNEY, ESQ.
6 Nevada Bar No. 011092
7 830 Las Vegas Boulevard South
8 Las Vegas, Nevada 89101
9 (702) 382-4044 Fax: (702) 383-9950
e-mail: info@johnpeterlee.com
Attorneys for Defendants
Optima Technology Corporation,
Optima Technology Corporation, and
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

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

12 JED MARGOLIN, an individual;
13
14 Plaintiff,

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

15 vs.

16 OPTIMA TECHNOLOGY CORPORATION,
17 a California corporation, OPTIMA
18 TECHNOLOGY CORPORATION, a Nevada
19 coporation, REZA ZANDIAN aka
20 GOLAMREZA ZANDIANJAZI aka
21 GHOLAM REZA ZANDIAN aka REZA
22 JAZI aka J. REZA JAZI AKA G. REZA JAZI
23 aka GHONONREZA ZANDIAN JAZI, an
24 individual, DOE Companies 1-10; DOE
25 Corporations 11-20, and DOE Individuals 21-
26 30,

27 Defendants.

1334.023382-td

28 **JOHN PETER LEE, LTD.'S AMENDED MOTION TO WITHDRAW FROM REPRESENTATION OF DEFENDANTS OPTIMA TECHNOLOGY CORPORATION, A CALIFORNIA CORPORATION; OPTIMA TECHNOLOGY CORPORATION, A NEVADA CORPORATION; AND REZA ZANDIAN aka GOLAMREZA ZANDIANJAZI aka GHOLAM REZA ZANDIAN aka REZA JAZI aka J. REZA JAZI AKA G. REZA JAZI aka GHONONREZA ZANDIAN JAZI**

COMES NOW, the law firm of JOHN PETER LEE, LTD., (the Firm) and moves this Honorable Court for an Order to Withdraw from representation of Defendants OPTIMA TECHNOLOGY CORPORATION, A CALIFORNIA CORPORATION; OPTIMA TECHNOLOGY

JOHN PETER LEE, LTD.
ATTORNEYS AT LAW
830 LAS VEGAS BLVD. SOUTH
LAS VEGAS, NEVADA 89101
Telephone (702) 382-4044
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1 CORPORATION, A NEVADA CORPORATION; AND REZA ZANDIAN aka GOLAMREZA
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
6 attached hereto.

7 **NOTICE OF MOTION**

8 TO: JED MARGOLIN, Plaintiff;

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

10 YOU WILL PLEASE TAKE NOTICE that the undersigned will bring the foregoing JOHN
11 PETER LEE, LTD.'S AMENDED MOTION TO WITHDRAW FROM REPRESENTATION OF
12 DEFENDANTS OPTIMA TECHNOLOGY CORPORATION, A CALIFORNIA CORPORATION;
13 OPTIMA TECHNOLOGY CORPORATION, A NEVADA CORPORATION; AND REZA
14 ZANDIAN aka GOLAMREZA ZANDIANJAZI aka GHOLAM REZA ZANDIAN aka REZA JAZI
15 aka J. REZA JAZI AKA G. REZA JAZI aka GHONONREZA ZANDIAN JAZI on for hearing
16 before the above entitled Court on the _____ day of _____, 2012,
17 at the hour of __:00 __.m. of said date, in Department XIX or as soon thereafter as Counsel can be
18 heard.

19 DATED this 13th day of March, 2012.

20 JOHN PETER LEE, LTD.

21 BY: 
22 JOHN PETER LEE, ESQ.
23 Nevada Bar No. 001768
24 JOHN C. COURTNEY, ESQ.
25 Nevada Bar No. 011092
26 830 Las Vegas Boulevard South
27 Las Vegas, Nevada 89101
28 Ph: (702) 382-4044
Attorneys for Defendants
*Optima Technology Corporation,
Optima Technology Corporation, and
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*

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DECLARATION OF COUNSEL
IN SUPPORT OF JOHN PETER LEE, LTD.'S AMENDED MOTION TO WITHDRAW
FROM REPRESENTATION OF DEFENDANTS OPTIMA TECHNOLOGY, A
CALIFORNIA CORPORATION; OPTIMA TECHNOLOGY CORPORATION, A
NEVADA CORPORATION; AND 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 and is competent to testify to the same. Declarant is an attorney licensed to practice law in Nevada and is an associate attorney with the law firm of John Peter Lee, Ltd., which represents OPTIMA TECHNOLOGY, A CALIFORNIA CORPORATION; OPTIMA TECHNOLOGY CORPORATION, A NEVADA CORPORATION; AND REZA ZANDIAN aka GOLAMREZA ZANDIANJAZI aka GHOLAM REZA ZANDIAN aka REZA JAZI aka J. REZA JAZI AKA G. REZA JAZI aka GHONONREZA ZANDIAN JAZI.

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 TECHNOLOGY CORPORATION, A NEVADA CORPORATION; AND REZA ZANDIAN aka GOLAMREZA ZANDIANJAZI aka GHOLAM REZA ZANDIAN aka REZA JAZI aka J. REZA JAZI AKA G. REZA JAZI aka GHONONREZA ZANDIAN JAZI. Declarant files JOHN PETER LEE, LTD.'S AMENDED MOTION TO WITHDRAW FROM REPRESENTATION OF DEFENDANTS OPTIMA TECHNOLOGY, A CALIFORNIA CORPORATION; OPTIMA TECHNOLOGY CORPORATION, A NEVADA CORPORATION; AND REZA ZANDIAN aka GOLAMREZA ZANDIANJAZI aka GHOLAM REZA ZANDIAN aka REZA JAZI aka J. REZA JAZI AKA G. REZA JAZI aka GHONONREZA ZANDIAN JAZI.

...
...
...

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
5 8775 Costa Verde Blvd.
6 San Diego, California 92122

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

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

14 6. This Declaration is made in good faith.

15 FURTHERMORE, Declarant sayeth naught.

16 
17 JOHN C. COURTNEY, ESQ.

18 **POINTS AND AUTHORITIES**

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

22 (i) If the application is made by the attorney, the attorney must
23 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
25 the case in the event the application for withdrawal is granted, and the
26 telephone number, or last known telephone number, at which the
27 client may be reached and the attorney must serve a copy of the
28 application upon the client and all other parties to the action or their
attorneys.

29 Pursuant to the above statutes and case law, John Peter Lee, Ltd. requests this Court for leave
30 to withdraw as counsel for Defendants OPTIMA TECHNOLOGY, A CALIFORNIA

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 13th day of March, 2012.

8 JOHN PETER LEE, LTD

9
10 BY: 

11 JOHN PETER LEE, ESQ.

12 Nevada Bar No. 001768

13 JOHN C. COURTNEY, ESQ.

14 Nevada Bar No. 011092

15 830 Las Vegas Boulevard South

16 Las Vegas, Nevada 89101

17 Ph: (702) 382-4044/Fax: (702) 383-9950

18 Attorneys for Defendants

19 *Optima Technology Corporation,*

20 *Optima Technology Corporation, and*

21 *Reza Zandian aka Golamreza Zandianjazi*

22 *aka Gholamreza Zandianjazi aka Gholam Reza*

23 *Zandian aka Reza Jazi aka J. Reza Jazi aka G. Reza*

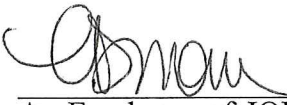
24 *Jazi aka Ghononreza Zandian Jazi*

CERTIFICATE OF MAILING

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I HEREBY CERTIFY that on the ___ day of March, 2012, I served a copy of the above and foregoing JOHN PETER LEE, LTD.'S AMENDED MOTION TO WITHDRAW FROM REPRESENTATION OF DEFENDANTS OPTIMA TECHNOLOGY CORPORATION, A CALIFORNIA CORPORATION; OPTIMA TECHNOLOGY CORPORATION, A NEVADA CORPORATION; AND 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.