

1 Matthew D. Francis (6978)  
Adam P. McMillen (10678)  
2 WATSON ROUNDS  
5371 Kietzke Lane  
3 Reno, NV 89511  
Telephone: 775-324-4100  
4 Facsimile: 775-333-8171  
*Attorneys for Plaintiff Jed Margolin*

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BY ~~GUTIERREZ~~ CLERK  
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7 **In The First Judicial District Court of the State of Nevada**  
8 **In and for Carson City**

10 **JED MARGOLIN, an individual,**

11 **Plaintiff,**

12 **vs.**

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

20 **Defendants.**

Case No.: 090C00579 1B

Dept. No.: 1

**DECLARATION OF ADAM P.**  
**MCMILLEN IN SUPPORT OF THE**  
**NOTICE OF NON-OPPOSITION TO**  
**JOHN PETER LEE, LTD'S MOTION**  
**TO WITHDRAW FROM**  
**REPRESENTATION**

21  
22 I, Adam P. McMillen, being first duly sworn, under oath, depose and say:

23 1. I am an associate at the law firm of Watson Rounds located at 5371 Kietzke  
24 Lane, Reno, Nevada 89511. I represent the Plaintiff, Jed Margolin, in the above referenced  
25 cause of action against the named Defendants. This declaration is based upon my personal  
26 knowledge, and is made in support of Plaintiff's Notice of Non-opposition to John Peter Lee,  
27 Ltd's Motion to Withdraw from Representation of Defendant Reza Zandian aka Golamreza  
28

1 Zandianjazi aka Gholam Reza Zandian aka Reza Jazi aka J. Reza aka G. Reza Jazi aka  
2 Ghononreza Zandian Jazi.

3 2. Attached as **Exhibit A** is a true and correct copy of said motion, which was  
4 delivered to Watson Rounds by the U.S. Postal Service on March 9, 2012.

5 I declare under penalty of perjury that the foregoing is true and correct to the best of  
6 my knowledge.

7 **Affirmation Pursuant to NRS 239B.030**

8 The undersigned does hereby affirm that the preceding document does not contain the  
9 social security number of any person.

10 DATED: March 15, 2012

WATSON ROUNDS

11  
12 By: —/s/ Adam P. McMillen  
13 Matthew D. Francis  
14 Adam P. McMillen  
15 Watson Rounds  
16 5371 Kietzke Lane  
17 Reno, NV 89511

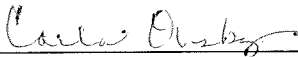
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28 Attorneys for Plaintiff Jed Margolin

**CERTIFICATE OF SERVICE**

1 Pursuant to NRCP 5(b), I certify that I am an employee of Watson Rounds, and that on  
2 this date, I deposited for mailing, in a sealed envelope, with first-class postage prepaid, a true  
3 and correct copy of the foregoing document, **Declaration of Adam P. McMillen in Support**  
4 **of the Notice of Non-Opposition of John Peter Lee, Ltd's Motion to Withdraw from**  
5 **Representation**, addressed as follows:  
6

7 John Peter Lee  
8 John Peter Lee, Ltd.  
9 830 Las Vegas Blvd. South  
10 Las Vegas, NV 89101

11 Dated: March 15, 2012

12   
13 \_\_\_\_\_  
14 Carla Ousby

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Index of Exhibits

| Exhibit No. | Description  | No. of Pages |
|-------------|--|--------------|
| 1           | A true and correct copy 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 aka G. Reza Jazi aka Ghononreza Zandian Jazi | 5            |

# Exhibit A

# Exhibit A

**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**  
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  
10 e-mail: [info@johnpeterlee.com](mailto:info@johnpeterlee.com)  
11 Attorneys for Defendant  
12 *Reza Zandian aka Golamreza Zandianjazi*  
13 *aka Gholamreza Zandianjazi aka Gholam Reza Zandian*  
14 *aka Reza Jazi aka J. Reza Jazi aka G. Reza Jazi aka*  
15 *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 Plaintiff,

13 vs.

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

25 Defendants.

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

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**  
24 **GHONONREZA ZANDIAN JAZI**

25 COMES NOW, the law firm of JOHN PETER LEE, LTD., (the Firm) and moves this  
26 Honorable Court for an Order to Withdraw from representation of Defendant REZA ZANDIAN aka  
27 GOLAMREZA ZANDIANJAZI aka GHOLAM REZA ZANDIAN aka REZA JAZI aka J. REZA  
28 JAZI AKA G. REZA JAZI aka GHONONREZA ZANDIAN JAZI. This Motion is made pursuant  
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.

**JOHN PETER LEE, LTD.**  
ATTORNEYS AT LAW  
830 LAS VEGAS BLVD. SOUTH  
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Telephone (702) 382-4044  
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**NOTICE OF MOTION**

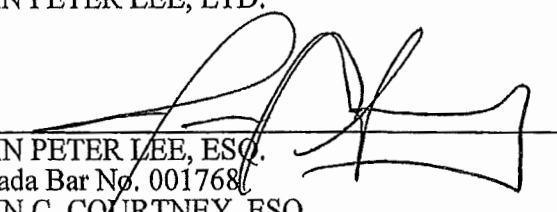
TO: JED MARGOLIN, Plaintiff;

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 6<sup>th</sup> 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

JOHN PETER LEE, LTD.  
ATTORNEYS AT LAW  
830 LAS VEGAS BLVD. SOUTH  
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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 GHOLAM REZA 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:

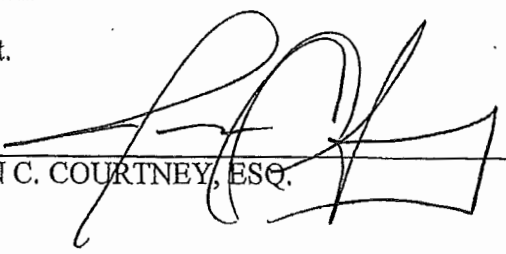
14 Reza Zandian  
15 8775 Costa Verde Blvd.  
16 San Diego, California 92122

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 JOHN C. COURTNEY, ESQ.

28



**JOHN PETER LEE, LTD.**  
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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 6<sup>th</sup> 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/Fax: (702) 383-9950  
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*

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CERTIFICATE OF MAILING

I HEREBY CERTIFY that on the 17<sup>th</sup> 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.