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8 *Attorneys for Fred Sadri, as Trustee for The Star Living*
9 *Trust, dated April 14, 1997 and Ray Koroghli and Sathsowi T.*
10 *Koroghli, as Managing Trustees for Koroghli Management Trust*

11 **UNITED STATES BANKRUPTCY COURT**
12 **DISTRICT OF NEVADA**

13 In re:
14
15 JAZI GHOLAMREZA ZANDIAN,
16
17 Debtor in Foreign Proceeding.

18 Case No.: 16-50644-btb
19 Chapter 15

20 **EX PARTE MOTION FOR ORDER**
21 **SHORTENING TIME TO HEAR**
22 **MOTION TO WITHDRAW AS**
23 **COUNSEL**

24 Movant, the law firm of Wright Finlay & Zak, LLP (hereinafter “WFZ”) by and
25 through its counsel of record, Yanxiong Li, Esq. of Wright, Finlay & Zak, LLP, hereby moves
26 this Court for an Order Shortening Time for Hearing on its Motion for Withdrawal as Counsel
27 for Plaintiffs/Counterclaimants in Adversary Proceeding and the Chapter 15 Bankruptcy Case.

28 This Motion is based upon the attached Memorandum of Points and Authorities and all
documents filed in support of the Motion.

DATED this 17th day of September, 2019.

WRIGHT, FINLAY & ZAK, LLP

/s/ Yanxiong Li

Yanxiong Li, Esq.
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Attorney for Plaintiffs/Counter-Defendants

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MEMORANDUM OF POINTS AND AUTHORITIES

I. INTRODUCTORY STATEMENT

Movant, WFZ, pursuant to Bankruptcy Rule 9006 and Local Rule 9006, seeks an order shortening time for the hearing on its **MOTION TO WITHDRAW AS COUNSEL FOR PLAINTIFFS/COUNTERDEFENDANTS**. The hearing on the Motion is expected to take approximately 5 minutes.

II. LEGAL STANDARD

FRBP 9006(c)(1) states,

Except as provided in paragraph (2) of this subdivision, when an act is required or allowed to be done at or within a specified time by these rules or by a notice given thereunder or by order of court, the court for cause shown may in its discretion with or without motion or notice order the period reduced.

Courts have generally acknowledged that such expedited relief does not violate due process rights, even if the motion to shorten time is made *ex parte*. "Bankruptcy Rule 9006(c) permits the bankruptcy court 'for cause shown' in its discretion, with or without motion or notice, to reduce the notice period, and *ex parte* motions for material reductions in the notice period are routinely granted by bankruptcy courts." *Hester v. NCNB Texas Nat'l Bank* (In re *Hester*), 899 F.2d 361, 364 n. 3 (5th Cir. 1990); *see also* 9 COLLIER ON BANKRUPTCY 9006.07 (Lawrence P. King ed., 15th ed. 1995); In re *Gledhill*, 76 F.3d 1070 (10th Cir. 1996).

Good cause exists because this Court has a scheduled hearing on October 1, 2019 to hear the Amended Motion to Dismiss. Further, due to the matters raised herein, including without limitation, the clients' consent to withdrawal of counsel, WFZ's intent to prepare/argue the Opposition to pending Amended Motion to Dismiss and there are no other deadlines in the Adversary Proceeding or Chapter 15 Bankruptcy Case.

III. COUNSEL HAS CONFERRED WITH ALL PARTIES

Wright, Finlay & Zak, LLP has requested and obtained approval for the order shortening time from all parties that have appeared and its clients in the instant case, as indicated on the accompanying Attorney Information Sheet.

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IV. CONCLUSION

Movant respectfully requests that this Court grant the instant *Ex Parte* Motion for Order Shortening Time for Hearing on Motion to Withdraw as Counsel.

DATED this 17th day of September, 2019.

WRIGHT, FINLAY & ZAK, LLP

/s/ Yanxiong Li
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