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

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

1334.023382-td

22 **JOHN PETER LEE, LTD.'S AMENDED MOTION TO WITHDRAW FROM**
23 **REPRESENTATION OF DEFENDANTS OPTIMA TECHNOLOGY CORPORATION, A**
24 **CALIFORNIA CORPORATION; OPTIMA TECHNOLOGY CORPORATION, A**
25 **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

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

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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

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:

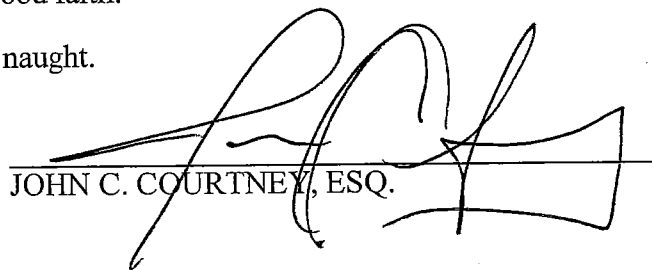
4 Reza Zandian
5 8775 Costa Verde Blvd.
6 San Diego, California 92122

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.
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13 JOHN C. COURTNEY, ESQ.
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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*

1 CERTIFICATE OF MAILING

2 I HEREBY CERTIFY that on the ___ day 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
11 Adam P. McMillen
12 WATSON & ROUNDS
13 5371 Kietzke Lane
14 Reno, Nevada 89511

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An Employee of JOHN PETER LEE, LTD.