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8 Attorneys for Plaintiff and Counter-Defendant  
9 T1 PAYMENTS, LLC and Counter-Defendant  
10 T1 PAYMENTS LIMITED

11 UNITED STATES DISTRICT COURT  
12 DISTRICT OF NEVADA (LAS VEGAS)

13 T1 PAYMENTS, LLC, a Nevada limited  
14 liability company,

15 Plaintiff,

16 vs.

17 NEW U LIFE CORPORATION, a  
18 California corporation,

19 Defendant.

20 \_\_\_\_\_  
21 NEW U LIFE CORPORATION, a  
22 California corporation,

23 Counterclaimant,

24 vs.

25 T1 PAYMENTS LLC, a Nevada limited  
26 liability company, et al.,

27 Counterclaim-Defendants.  
28

Case No. 2:19-cv-01816-ART-DJA

**MOTION TO WITHDRAW AS *PRO*  
*HAC VICE* COUNSEL OF  
RECORD**



1 **MEMORANDUM OF POINTS AND AUTHORITIES**

2 Local Rule IA 11-6(b) provides, “If any attorney seeks to withdraw after  
3 appearing in a case, the attorney must file a motion or stipulation and serve it on the  
4 affected client and opposing counsel.” Furthermore, LR 11-6(e) provides that “no  
5 withdrawal or substitution will be approved if it will result in delay of discovery, the  
6 trial, or any hearing in the case.” Similarly, Nevada Rule of Professional Conduct  
7 1.16(b) provides that a lawyer may withdraw from representing a client if  
8 “[w]ithdrawal can be accomplished without material adverse effect on the interests  
9 of the client.”

10 Due to the attorney-client privilege and Counsel’s duties of confidentiality  
11 and loyalty, Counsel cannot disclose the specific circumstances prompting the  
12 instant Motion. However, as set forth in the Declaration of Richard C. Harlan below,  
13 multiple bases identified in NRPC 1.16(b) exist for Counsel’s withdrawal.  
14 Generally, the relationship between the Firm and the T1 Parties has broken down to  
15 the extent that Counsel can no longer effectively represent Defendants’ interests.  
16 Harlan Decl. ¶5.

17 Here, the docket represents that the T1 Parties are represented by multiple  
18 attorneys.

19 The known contact information for the attorneys representing the T1 Parties  
20 are as follows:

21 **T1 Payments LLC**  
22 10161 W. Park Run Drive, Suite 150  
23 Las Vegas, NV 89145

**T1 Payments Ltd.**  
290 Moston Lane,  
Manchester, England,  
M40 9WB

24 **Jeffrey A. Cogan**  
25 Jeffrey A. Cogan Esq. Ltd.  
26 1057 Whitney Ranch Drive, Suite 350  
Henderson, NV 89014  
27 702-474-4228 (fax)  
28 jeffrey@jeffreycogan.com

**Jeffrey A. Cogan**  
Jeffrey A. Cogan Esq. Ltd.  
1057 Whitney Ranch Drive, Suite 350  
Henderson, NV 89014  
702-474-4228 (fax)  
jeffrey@jeffreycogan.com

1 **Joshua P. Gilmore**  
2 Bailey Kennedy  
3 8984 Spanish Ridge Avenue  
4 Las Vegas, NV 89148  
5 (702) 562-8820  
6 (702) 562-8821 (fax)  
7 jgilmore@baileykennedy.com

**Dennis L. Kennedy**  
Bailey Kennedy  
8984 Spanish Ridge Avenue  
Las Vegas, NV 89148  
(702) 562-8820  
(702) 562-8821 (fax)  
dkennedy@baileykennedy.com

6 **Kelly B. Stout**  
7 Hone Law  
8 701 N. Green Valley Pkwy., Suite 200  
9 Henderson, NV 89074  
10 702-608-2896  
11 702-608-2896 (fax)  
12 kstout@hone.law

13 **CONCLUSION**

14 Accordingly, Counsel respectfully requests that this Court grant the Motion to  
15 Withdraw as Counsel of Record, and allow Larson LLP to withdraw as counsel for  
16 the T1 Parties.

17 Dated: January 16, 2024

LARSON LLP

18 By: /s/ R.C. Harlan

19 R.C. HARLAN (*admitted pro hac vice*)

20 Attorneys for Plaintiff and Counter-Defendant  
21 T1 PAYMENTS, LLC and Counter-Defendant  
22 T1 PAYMENTS LIMITED  
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**DECLARATION OF RICHARD C. HARLAN**

I, Richard C. Harlan, being first duly sworn, deposes and says:

1. This Declaration is made of my own personal knowledge except where stated on information or belief, and as to those matters, I believe them to be true. If called as a witness, I would competently testify thereto.

2. I hereby affirm under penalty of perjury that the assertions of this Declaration are true.

3. I am a partner with the law firm of Larson LLP and am licensed to practice law in the State of California. I am admitted pro hac vice in the U.S. District Court Nevada and I serve as counsel of record in this action for T1 Payments, LLC and TI Payments Limited.

4. This Declaration is submitted pursuant to NRPC 1.16, and SCR 46 in support of Larson LLP’s Motion to Withdraw as Counsel of Record (the “Motion”).

5. Due to the attorney-client privilege and Counsel’s duties of confidentiality and loyalty, Counsel cannot disclose the specific circumstances prompting the instant Motion. However, multiple bases identified in Rule 1.16(b) of the Nevada Rules of Professional Conduct exist for Counsel’s withdrawal. Generally, the relationship between Counsel and T1 Parties has broken down to the extent that Counsel can no longer effectively represent T1 Parties’ interests. These issues would make Counsel’s continued representation of them unreasonably difficult, financially burdensome and impractical. Counsel has made several attempts to resolve these issues, but attempts have been unsuccessful.

6. I have previously provided T1 Parties reasonable notice of the Firm’s intention to withdraw, and have received no response.

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I declare under penalty of perjury that the foregoing is true and correct.  
Executed this 16th day of January, 2024, at Los Angeles, California.

/s/ R.C. Harlan  
Richard C. Harlan

**IT IS SO ORDERED.**

DATED: 1/18/2024



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DANIEL J. ALBREGTS  
UNITED STATES MAGISTRATE JUDGE

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**CERTIFICATE OF SERVICE**

I certify that I am an employee of Larson LLP, and that on the 16th day of January, 2024, a true and correct copy of the foregoing document entitled **MOTION TO WITHDRAW AS COUNSEL *PRO HAC VICE*** was electronically filed with the Clerk of the Court by using CM/ECF service which will provide copies to all counsel of record registered to receive CM/ECF notification. Notice was also provided to the following parties in the following manner:

Via USPS and FedEx  
T1 Payments LLC  
10161 W. Park Run Drive, Suite 150  
Las Vegas, NV 89145

Via International Mail  
T1 Payments Ltd.  
290 Moston Lane  
Manchester, England  
M40 9WB

/s/ R.C. Harlan  
Richard C. Harlan

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UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA  
SOUTHERN DIVISION

T1 PAYMENTS, LLC, a Nevada limited liability company,  
Plaintiff,  
vs.  
NEW U LIFE CORPORATION, a California corporation,  
Defendant.

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NEW U LIFE CORPORATION, a California corporation,  
Counterclaimant,  
vs.  
T1 PAYMENTS LLC, a Nevada limited liability company, et al.,  
Counterclaim-Defendants.

Case No. 2:19-cv-01816-ART-DJA  
**(PROPOSED) ORDER GRANTING R.C. HARLAN'S MOTION TO WITHDRAW AS *PRO HAC VICE* COUNSEL FOR T1 PAYMENTS, LLC AND T1 PAYMENTS LIMITED**



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**(PROPOSED) ORDER**

This matter having come before this Court pursuant to the motion to withdraw as *Pro Hac Vice* counsel for Plaintiff and Counterclaim-Defendant T1 Payments LLC and Counterclaim-Defendant T1 Payments Ltd. filed by R.C. Harlan.

GOOD CAUSE APPEARING THEREFOR:

**IT IS HEREBY ORDERED** that R.C. Harlan is hereby relieved as *Pro Hac Vice* attorney of record for Plaintiff and Counterclaim-Defendant T1 Payments LLC and Counterclaim-Defendant T1 Payments Ltd. in this action.

Dated: \_\_\_\_\_

\_\_\_\_\_  
United States District Judge

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I certify that I am an employee of Larson LLP, and that on the 16th day of January, 2024, a true and correct copy of the foregoing document entitled **(PROPOSED) ORDER GRANTING R.C. HARLAN’S MOTION TO WITHDRAW AS *PRO HAC VICE* COUNSEL FOR T1 PAYMENTS, LLC AND T1 PAYMENTS LIMITED** was electronically filed with the Clerk of the Court by using CM/ECF service which will provide copies to all counsel of record registered to receive CM/ECF notification. Notice was also provided to the following parties in the following manner:

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Manchester, England  
M40 9WB

/s/ R.C. Harlan  
Richard C. Harlan