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6 UNITED STATES DISTRICT COURT
 7 DISTRICT OF ARIZONA

9 JENNA MASSOLI p/k/a JENNA JAMESON,)
 10 Plaintiff,)
 11 vs.)
 12 "REGAN MEDIA," and JUDITH REGAN, an)
 13 individual,)
 14 Defendants.)

Case No.: CV 05-0854 PHX EHC
 APPLICATION TO WITHDRAW AS
 COUNSEL FILED BY LIPSITZ, GREEN,
 FAHRINGER, ROLL, SALISBURY &
 CAMBRIA, LLP
 (Assigned to the Honorable Earl H. Carroll)

16 REGAN MEDIA, INC., a New York)
 17 corporation, and JUDITH REGAN, an)
 18 individual,)
 19 Defendants/Counterclaimants)
 20 vs.)
 21 JENNA MASSOLI p/k/a JENNA JAMESON,)
 22 an individual,)
 23 Plaintiff/Counter-defendant,)
 24 and)
 25 JAY GRDINA, an individual,)
 Third-Party Defendant.)

27 Pursuant to LCRiv 83.3(b)(2) and (3)(B), Rules of Practice of the United States District
 28 Court for the District of Arizona ("Local Rules"), attorney Jeffrey F. Reina and the firm of

1 Lipsitz, Green, Fahringer, Roll, Salisbury & Cambria, LLP (collectively "Lipsitz") hereby apply
2 to this Court to withdraw as counsel for plaintiff/counterdefendants Jenna Massoli p/k/a Jenna
3 Jamson, Jay Grdina, and Dolce Amore, Inc. (collectively "Plaintiffs"). Irreconcilable
4 differences have arisen between counsel and Plaintiffs. Specifically, Plaintiffs have discharged
5 Lipsitz, but have failed and refused to execute the necessary documents to effect the withdrawal
6 of Lipsitz.

7 Plaintiffs have not responded to Lipsitz's request to allow Lipsitz to voluntarily
8 withdraw. If this Application is granted, the following contact information is where all
9 defendants can be reached by mail or telephone:

10 16444 North 91st Street, Suite 100
11 Scottsdale, Arizona 85260
12 (480) 471-5583

13 Counsel is aware if a possible alternate address for Dolce Amore, Inc. ("Dolce Amore")

14 Dolce Amore, Inc.
15 15270 N. 83rd Place
16 Scottsdale, Arizona 85260

17 Although this matter has been set for trial, and Local Rule LRCiv 83.3(b)(3) would
18 normally apply, Lipsitz does not believe that its withdrawal at this time would prejudice
19 Plaintiffs in any way, and that good cause therefore exists to grant this Application. The trial is
20 set to begin on August 7, 2006, which is more than five (5) months away. Plaintiffs continue to
21 have the assistance of their Arizona counsel in this matter, Renaud, Cook, Drury, Mesaros, PA,
22 who have acted as trial counsel since the discharge of Lipsitz.


24 Additionally, Plaintiffs have the assistance of their "regular" transactional attorney, Gary
25 L. Crandell, Esq. of Denver, Colorado, who can advise them regarding legal matters until
26 alternate litigation counsel has been retained. Although Mr. Crandell has been disclosed as a
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1 witness in this matter, he can still perform the previously-described functions and can make an
2 appearance in this matter.

3 The concurrently-filed Certificate of attorney Jeffrey F. Reina sets forth compliance with
4 LRCiv 83.3(b)(2)(A).

5 RESPECTFULLY SUBMITTED this 7th day of March 2006.
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8 LIPSITZ, GREEN, FAHRINGER, ROLL
9 SALISBURY & CAMBRIA, LLP

10 By: 
11 Jeffrey F. Reina
12 42 Delaware Avenue, Suite 300
13 Buffalo, NY 14202
Attorneys for Plaintiff/Counterdefendant

14 The forgoing was filed electronically this
15 7th day of March 2006.

16 COPY of the foregoing was sent via Overnight Mail
17 to the Honorable Earl H. Carroll this 7th day
18 of March 2006.

19 COPY of the foregoing was mailed this
20 7th day of March 2006.

21 James L. Blair, Esq.
22 Roger W. Hall, Esq.
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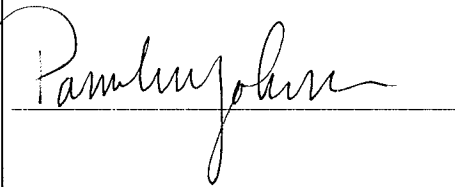
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6 Phoenix, AZ 85004

7 Ms. Jenna Massoli
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9 Scottsdale, AZ 85260

10 Mr. Jay Grdina
11 16444 North 91st Street, Suite 100
12 Scottsdale, AZ 85260

13 Dolce Amore, Inc.
14 c/o Mr. Jay Grdina
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