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6  
 7 **UNITED STATES DISTRICT COURT**  
 8 **DISTRICT OF ARIZONA**

9 JENNA MASSOLI p/k/a JENNA JAMESON,  
 10  
 Plaintiff,

CV 05-0854 PHX EHC

11 v.

**APPLICATION TO WITHDRAW  
 AS COUNSEL FILED BY RENAUD  
 COOK DRURY MESAROS, PA**

12 “REGAN MEDIA,” JUDITH REGAN, as an  
 individual,

13 Defendant.

*(Assigned to the Honorable  
 Earl H. Carroll)*

14 REGAN MEDIA, INC., a New York corporation,  
 and JUDITH REGAN, an individual,

15 Defendants/Counterclaimants,

16 v.

17 JENNA MASSOLI, p/k/a JENNA JAMESON, an  
 individual,

18 Plaintiff/Counterdefendant,

19 and

20 JAY GRDINA, an individual,

21 Third-Party Counterdefendant,

22 and

23 DOLCE AMORE, INC., a Colorado corporation,

24 Counterdefendant.  
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1 Pursuant to LRCiv 83.3(b)(2) and (3)(B), Rules of Practice of the United States  
2 District Court for the District of Arizona (“Local Rules”), attorneys James L. Blair and Roger  
3 W. Hall and the firm of Renaud Cook Drury Mesaros, PA (“RCDM”) hereby apply to this  
4 Court to withdraw as counsel for plaintiff/ counterdefendants Jenna Massoli p/k/a Jenna  
5 Jameson, Jay Grdina, and Dolce Amore, Inc. (collectively, “Plaintiffs”). Irreconcilable  
6 differences have arisen between counsel and Plaintiffs, and Plaintiffs have failed to meet their  
7 financial obligations to counsel.

8 Plaintiffs have not responded to RCDM’s recent letters, e-mails, and voice mails. If  
9 this Application is granted, the following contact information is where all defendants can be  
10 reached by mail or telephone:

11 16444 North 91<sup>st</sup> Street, Suite 100  
12 Scottsdale, Arizona 85260  
(480) 471-5583

13 Counsel is aware of a possible alternate address for Dolce Amore, Inc. (“Dolce Amore”),  
14 which is:

15 Dolce Amore, Inc.  
16 15270 N. 83<sup>rd</sup> Place  
Scottsdale, Arizona 85260

17 Although this matter has been set for trial, and Local Rule LRCiv 83.3(b)(3) would  
18 normally apply, RCDM 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  
20 is set to begin on August 7, 2006, which is five months away. Additionally, plaintiff Jenna  
21 Massoli is a well-known adult film star whose professional name is Jenna Jameson. Ms.  
22 Massoli has tremendous financial resources at her disposal. Counterdefendant Jay Grdina is  
23 Ms. Massoli’s husband, and counterdefendant Dolce Amore is a corporation whose sole  
24 shareholders are Ms. Massoli and Mr. Grdina. Ms. Massoli, Mr. Grdina, and Dolce Amore  
25 have more than adequate funds available to them with which to retain

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1 alternate counsel between now and the proposed trial date so that neither they, nor their new  
2 counsel, will have any problems complying with this Court's deadlines.

3 Additionally, Plaintiffs have the assistance of their longtime transactional attorney,  
4 Gary L. Crandell, Esq., of Denver, Colorado, who can advise them regarding legal matters until  
5 alternate litigation counsel has been retained. Although Mr. Crandell has been disclosed as a  
6 witness in this matter, he can still perform the previously-described functions until new  
7 counsel can make an appearance in this matter.

8 The concurrently-filed Certificate of attorney Roger W. Hall sets forth RCDM's  
9 compliance with LRCiv 83.3(b)(2)(A).

10 RESPECTFULLY SUBMITTED this 7<sup>th</sup> day of March, 2006.

11 RENAUD COOK DRURY MESAROS, PA

12  
13 By: /s/ Roger W. Hall  
14 James L. Blair  
15 Roger W. Hall  
16 Phelps Dodge Tower  
17 One North Central, Suite 900  
18 Phoenix, AZ 85004-4417  
19 *Attorneys for Plaintiff/Counterdefendants*

17 Filed electronically this  
18 7<sup>th</sup> day of March, 2006.

19 COPY of the foregoing hand-delivered  
20 to the Honorable Earl H. Carroll this 7<sup>th</sup> day  
21 of March, 2006.

21 COPY of the foregoing mailed this 7<sup>th</sup>  
22 day of March, 2006, to:

23 Jeffrey F. Reina, Esq.  
24 LIPSITZ, GREEN, FAHRINGER, ROLL,  
25 SALISBURY & CAMBRIA LLP  
26 42 Delaware Avenue, Suite 300  
Buffalo, NY 14202-3857  
*Co-counsel for Plaintiff/Counterdefendants*

26 ///

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Dennis K. Blackhurst, Esq.  
2 STEPTOE & JOHNSON, LLP  
Collier Center  
3 201 East Washington Street, Ste 1600  
Phoenix, AZ 85004-2382  
4 *Attorneys for Defendants/Counterclaimants*

5 Ms. Jenna Massoli  
16444 North 91<sup>st</sup> Street, Suite 100  
6 Scottsdale, Arizona 85260

7 Mr. Jay Grdina  
16444 North 91<sup>st</sup> Street, Suite 100  
8 Scottsdale, Arizona 85260

9 Dolce Amore, Inc.  
c/o Mr. Jay Grdina  
10 16444 North 91<sup>st</sup> Street, Suite 100  
Scottsdale, Arizona 85260

11 Dolce Amore, Inc.  
12 15270 N. 83<sup>rd</sup> Place  
Scottsdale, Arizona 85260

13  
14 /s/ Deborah Robertson

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