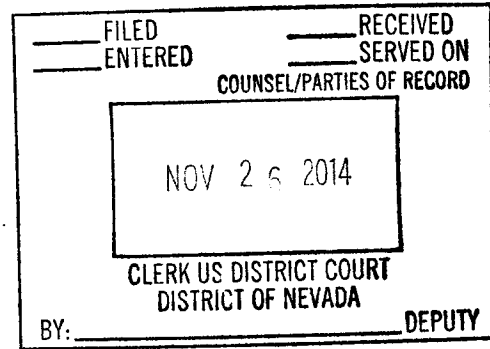


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7 **IN THE UNITED STATES DISTRICT COURT**
8 **DISTRICT OF NEVADA**

8 FRANCISCO JOSE MERCHAN ROCHA,

9 Plaintiff,

10 vs.

11 VERONICA MOLANO FLOREZ, AKA,
12 VERONICA GABRIELLE,

13 Defendant.

2:14-CV-00051-RCJ-(VCF)

**MOTION TO WITHDRAW
AS ATTORNEY OF RECORD**

14 COMES NOW Christopher P. Ford, Esq, and Matthew H. Friedman, Esq. of the firm
15 Ford & Friedman, and pursuant to the Nevada Rules of Professional Conduct (“NRPC”) 1.16
16 hereby move to withdraw as counsel of record for Defendant Veronica Gabrielle (hereinafter
17 “Ms. Gabrielle”). This motion is made on the points and authorities as well as the declaration
18 of Christopher P. Ford, Esq. below.

19 **Declaration of Christopher P. Ford, Esq. In Support of Motion to Withdraw as Attorney**
20 **of Record**

21 I Christopher P. Ford, Esq. attest under penalty of perjury that:

- 22 1. My name is Christopher P. Ford, I am a member in good standing of the State Bar of
23 Nevada.

- 1 2. I have personal knowledge of the facts contained in this affidavit, save those stated upon
2 information and belief, and as to those matter, I believe them to be true.
- 3 3. Ford & Friedman was retained to represent Ms. Gabrielle on January 17, 2014.
- 4 4. On September 22, 2014 my office received an email from Ms. Gabrielle with an
5 attached letter/discharge of counsel. In this attached letter Ms. Gabrielle made it very
6 clear that she had decided to discharge myself and my office as her counsel in this
7 matter and that she no longer wished for us to represent her or her interests as of the date
8 and time of the letter.
- 9 5. The last known contact information for Ms. Gabrielle is:

10 Veronica Gabrielle
11 9143 W. Torino Ave.
12 Las Vegas, Nevada 89148
702-366-3561
702-857-0644

- 13 6. For the foregoing reasons, the undersigned requests an Order of Withdrawal
14 I declare under penalty of perjury that the foregoing is true and correct.

15 This 23rd day of September, 2014.

16 /s/ Christopher P. Ford
17 Christopher P. Ford, Esq.

18 **POINTS AND AUTHORITIES**

19 **I. STATEMENT OF FACTS**

20 As set forth above, Ms. Gabrielle retained Christopher P. Ford, Esq. and the firm of Ford
21 & Friedman to represent her and act as attorney of record in the above referenced matter.
22 Although Mr. Ford was willing and able to represent Ms. Gabrielle, Ms. Gabrielle discharged
23 Mr. Ford, requesting specifically that no further legal work be done on her behalf. Ms.
24

1 Gabrielle's letter made clear that she was certain about her decision to discharge Mr. Ford.

2 The Nevada Rules of Professional Conduct read, in relevant part that:

3 (a) where representation has commenced, shall withdraw from the representation of a
4 client if:

5 (3) The lawyer is discharged.

6 See Nevada Rules of Professional Conduct at 1.16(a)(3). As the client in this matter has clearly
7 discharged the law firm of Ford & Friedman, and attorneys Christopher P. Ford, Esq. and
8 Matthew H. Friedman, Esq., good cause exists to grant the instant Motion to Withdrawal as
9 Counsel of Record.

10 **II. CONCLUSION**

11 Based upon the foregoing, Christopher P. Ford, Esq. and Matthew H. Friedman, Esq., of
12 the law firm Ford & Friedman request that the Court enter an order approving their respective
13 withdrawal as attorneys for Defendant Veronica Gabrielle.

14 **DATED** this 23rd day of September, 2014.

15
16 FORD & FRIEDMAN

17 /s/ Christopher P. Ford
18 Christopher P. Ford, Esq.
19 Nevada State Bar No. 11570
20 Matthew H. Friedman, Esq.
21 Nevada State Bar No. 11571
22 2520 St. Rose Parkway, Suite 309
23 Henderson, Nevada 89074

24 IT IS SO ORDERED:


UNITED STATES DISTRICT JUDGE

DATED: 11/26/14

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PROOF OF SERVICE

I hereby certify that on this 23rd day of September 2014, a true copy of the forgoing document described as “**MOTION TO WITHDRAW AS COUNSEL OF RECORD**”, was filed via the Court’s CM/ECF system and served via transmission of the Notice of Electronic Filing (NEF), to all interested parties as follows:

Emily Mcfarling Benson, Esq.
eservice@mcfarlinglaw.com
Attorney for Plaintiff

And served via U.S. Mail, postage prepaid thereon, as follows:

Veronica Gabrielle
9143 W. Torino Avenue
Las Vegas, Nevada 89148

/s/ Kelly Wulf
An employee of FORD & FRIEDMAN