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 17 Top Rank, Inc.

18 **UNITED STATES DISTRICT COURT**

19 **DISTRICT OF NEVADA**

20 MIGUEL ANGEL GARCIA a.k.a. MIKEY
 GARCIA, an individual,

21 Plaintiff,

22 v.

23 TOP RANK, INC., a Nevada corporation;
 24 and DOES 1-10, inclusive,

25 Defendants.

Case No. 2:14-cv-01456-RFB-PAL

Hon. Richard F. Boulware, II

**UNOPPOSED MOTION AND PROPOSED
 ORDER FOR ADAM L. BLOOM TO
 WITHDRAW AS COUNSEL FOR
 DEFENDANT TOP RANK, INC.**

MOTION FOR ADAM L. BLOOM TO
 WITHDRAW
 CASE NO. 2:14-CV-01456

1 Adam L. Bloom respectfully moves the Court for an order permitting Adam L. Bloom to
2 withdraw as counsel for Defendant Top Rank, Inc., in the above captioned matter, pursuant to
3 Local Rule IA 10-6.

4 This Motion is made and based upon the Memorandum of Points and Authorities
5 submitted herein and the Declaration of Adam L. Bloom attached hereto.

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8 Dated: August 24, 2015

DANIEL M. PETROCELLI
DAVID MARROSO
DREW E. BREUDER
ADAM L. BLOOM
O'MELVENY & MYERS LLP

J. COLBY WILLIAMS
CAMPBELL & WILLIAMS

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14 By: 

Adam L. Bloom
Attorneys for Defendant
Top Rank, Inc.

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MEMORANDUM OF POINTS AND AUTHORITIES

Adam L. Bloom (“Mr. Bloom”) respectfully moves the Court pursuant to Local Rule IA 10-6 for leave to withdraw the appearance of Adam L. Bloom as counsel in this matter. This Motion is precipitated by Mr. Bloom’s pending departure from the law firm of O’Melveny & Myers LLP.

Local Rule IA 10-6(b) provides that “No attorney may withdraw after appearing in a case except by leave of Court after notice has been served on the affected client and opposing counsel.” Defendant Top Rank has been informed of Mr. Bloom’s intent to withdraw and does not oppose. Additionally, counsel for Plaintiff Miguel Angel Garcia has been informed of Mr. Bloom’s intent to withdraw and does not oppose.

Local Rule IA 10-6(e) provides that “no withdrawal . . . shall be approved if delay of discovery, the trial or any hearing would result.” Here, no delay will result from Mr. Bloom’s withdrawal, as O’Melveny & Myers LLP attorneys Daniel M. Petrocelli, David Marroso, and Drew E. Breuder will continue to appear on behalf of Defendant Top Rank, Inc. Mr. Bloom’s withdrawal will not prejudice either party or delay any proceeding in this matter.

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CONCLUSION

For the reasons set forth above, Mr. Bloom respectfully moves this Court to enter an order approving the withdrawal of Mr. Bloom as a representing attorney for Defendant Top Rank, Inc. in the instant matter.

Dated: August 24, 2015

DANIEL M. PETROCELLI
DAVID MARROSO
DREW E. BREUDER
ADAM L. BLOOM
O'MELVENY & MYERS LLP

J. COLBY WILLIAMS
CAMPBELL & WILLIAMS

By: 
Adam L. Bloom
Attorneys for Defendant
Top Rank, Inc.

IT IS SO ORDERED:


UNITED STATES MAGISTRAGE JUDGE

DATED: August 26, 2015