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8 *Attorneys for Defendants,*
ACCESS MEDICAL, LLC and
ROBERT "SONNY" WOOD
9

10 **UNITED STATES DISTRICT COURT**
11 **DISTRICT OF NEVADA**

12 NAUTILUS INSURANCE COMPANY,

Case No.: 2:15-cv-00321-JAD-GWF

13 Plaintiff,

14 vs.

15 ACCESS MEDICAL, LLC; ROBERT
16 CLARK WOOD, II; FLOURNOY
MANAGEMENT, LLC; and DOES 1-10,
inclusive,

17 Defendants.

18 **SECOND MOTION AND PROPOSED ORDER**
19 **TO WITHDRAW AS COUNSEL OF RECORD**

20
21 MARTIN J. KRAVITZ, ESQ. and L. RENEE GREEN, ESQ., respectfully move this
22 court for an order permitting Martin J. Kravitz, Esq. and L. Renee Green, Esq. (Counsel) to
23 withdraw as counsel for Plaintiff, ROBERT "SONNY" WOOD, an individual, and ACCESS
24 MEDICAL, LLC, a Delaware Limited Liability Corporation.

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1 This Motion is made and based upon the Memorandum of Points and Authorities
2 submitted herewith, Local Rule IA 11-6 and (e), the Declaration of Martin J. Kravitz, Esq.
3 attached hereto, and the pleadings and papers on file herein.

4 DATED this 1st day of December, 2021.

5 KRAVITZ SCHNITZER JOHNSON
6 WATSON & ZEPPENFELD, CHTD.

7 By: /s/ Martin J. Kravitz, Esq.

8 MARTIN J. KRAVITZ, ESQ.
9 Nevada Bar No. 83
10 L. RENEE GREEN, ESQ.
11 Nevada Bar No. 12755
12 8985 So. Eastern Avenue, Suite 200
13 Las Vegas, Nevada 89123
14 *Attorney for Defendants*

15 **DECLARATION OF MARTIN J. KRAVITZ, ESQ.**

16 I, Martin J. Kravitz, hereby declare under penalty of perjury as follows:

17 1. I am Senior Partner in the law firm of Kravitz Schnitzer Johnson Watson &
18 Zeppenfeld, Chtd., formerly known as Kravitz, Schnitzer & Johnson, Chtd.

19 2. I am knowledgeable about all matters set forth in this Declaration and know them
20 to be true, except where stated upon information and belief, and in those instances I believe them
21 to be true.

22 3. This firm has been co-counsel in this matter with Jordan P. Schnitzer, Esq.,
23 representing the Defendants, ROBERT "SONNY" WOOD, and ACCESS MEDICAL, LLC.
24 When the Nevada Supreme Court accepted the Certified Question in late 2019 in Case No.
25 79130, it was our intent to disassociate as counsel in all of pending cases involving Mr. Wood
26 and Access Medical. On January 21, 2020, a Stipulation of Change of Counsel to remove the
27 Martin J. Kravitz, Esq. and L. Renee Green, Esq. was filed in the Nevada Supreme Court, and
28 thereby relieving responsibility in that case.

4. In this matter, we have not communicated with Mr. Wood for approximately two
(2) years. All work on behalf of Defendants have been handled solely by Jordan P. Schnitzer of
The Schnitzer Law Firm.

1 5. L. Renee Green, Esq. has now left my firm. I hereby request the Court grant the
2 Motion to Withdraw as Counsel for Defendants, and remove me and L. Renee Green from the
3 service list.

4 6. The last known address for Mr. Wood and Access Medical, LLC is:

5 Robert “Sonny” Wood
6 4955 S. Durango Dr. Suite 180
7 Las Vegas, NV 89113

8 Access Medical, LLC
9 4955 S. Durango Dr. Suite 180
10 Las Vegas, NV 89113

11 7. There is no prejudice in granting this Motion to Withdraw as Defendants will
12 continue to be represented by Jordan P. Schnitzer, Esq.

13 I declare under penalty of perjury the foregoing is true and correct.

14 DATED this 1st day of December, 2021.

15 /s/ Martin J. Kravitz
16 MARTIN J. KRAVITZ

17 **MEMORANDUM OF POINTS AND AUTHORITIES**

18 The United States District Court Local Rules IA 11-6 provides that an attorney may
19 withdraw from representation of a client under certain circumstances. Specifically, Local Rule
20 IA 11-6(b) states:

21 If an attorney seeks to withdraw after appearing in a case, the
22 attorney must file a motion or stipulation and serve it on the
23 affected client and opposing counsel. The affected client may, but
24 is not required to, file a response to the attorney’s motion within 14
25 days of the filing of the motion, unless the court orders otherwise.

26 Local Rule IA 11-6(e) further provides: “Except for good cause shown, no withdrawal or
27 substitution will be approved if it will result in delay of discovery, the trial, or any hearing in the
28 case.”

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1 Good cause exists to allow Martin J. Kravitz, Esq. and L. Renee Green, Esq. to withdraw
2 as *co-counsel* for Defendants as outlined in the Declaration of Martin J. Kravitz, Esq. There will
3 be no delay in the proceeding as Jordan P. Schnitzer, Esq. will remain counsel for Defendants.

4 **CONCLUSION**

5 Based upon the foregoing, Martin J. Kravitz, Esq. and L. Renee Green, Esq. respectfully
6 request that this Court grant their Motion to Withdraw as counsel for Defendants, ROBERT
7 “SONNY” WOOD, and ACCESS MEDICAL, LLC.

8 DATED this 1st day of December, 2021.

9
10 KRAVITZ SCHNITZER JOHNSON
WATSON & ZEPPENFELD, CHTD.

11
12 By: /s/ Martin J. Kravitz, Esq.

13 MARTIN J. KRAVITZ, ESQ.
14 Nevada Bar No. 83
15 L. RENEE GREEN, ESQ.
16 Nevada Bar No. 12755
17 8985 So. Eastern Avenue, Suite 200
18 Las Vegas, Nevada 89123

19 **ORDER**

20 **IT IS SO ORDERED**

21 **DATED:** 10:28 am, December 02, 2021

22 

23 **BRENDA WEKSLER**
24 **UNITED STATES MAGISTRATE JUDGE**
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CERTIFICATE OF SERVICE

I hereby certify that on the 1st day of December, 2021, pursuant to Local Rule 5.1, I serviced the foregoing **SECOND MOTION AND PROPOSED ORDER TO WITHDRAW AS COUNSEL OF RECORD**, via the Court's CM/EMF electronic filing system addressed to all parties on the e-service list and by mail, as follows:

Jordan P Schnitzer Jordan@theschnitzerlawfirm.com, melisa@theschnitzerlawfirm.com, olivia@theschnitzerlawfirm.com

Eric Sebastian Powers Eric.powers@ericpowerslaw.com

Linda W. Hsu lhsu@selmanlaw.com, psmith@selmanlaw.com, slipsitz@selmanlaw.com

Robert "Sonny" Wood
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Access Medical, LLC
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Flournoy Management, LLC
8550 W. Charleston Blvd.
Suite 102-355
Las Vegas, NV 89117

/s/ Cynthia Lowe
An employee of Kravitz Schnitzer Johnson
Watson & Zeppenfeld, Chtd.