

1 Elaine A. Dowling, Esq.
 Nevada Bar No. 8051
 2 EAD LAW GROUP LLC
 3 6671 S. Las Vegas Blvd., Suite 210
 Las Vegas, Nevada 89119
 4 (702) 761-6769
 5 ead@eadlawgroup.com
Attorneys for Plaintiffs

7 UNITED STATES DISTRICT COURT
 8
 9 DISTRICT OF NEVADA

11 ROCK N’ ROLL FOODS, LLC, a Nevada
 Limited Liability Company; RICHARD
 12 “ROCKY” PARKS, an individual,
 13
 14 Plaintiffs,

CASE NO.: 2:15-CV-00988-JAD-CWH

**MOTION AND PROPOSED ORDER TO
 WITHDRAW AS COUNSEL OF RECORD**

15 v.

16 STEPHEN FRAZER, an individual; PIOTR
 TOMISK, an individual; EMERGING
 17 TECHNOLOGY CORPORATION, a Nevada
 corporation, DOES I through X, inclusive; ROE
 18 CORPORATIONS I through X, inclusive,
 19
 20 Defendants.

22 ELAINE A. DOWLING, ESQ., respectfully moves this court for an order permitting
 23
 24 ELAINE A. DOWLING, ESQ. (“Ms. Dowling”) who has appeared in these proceedings, to
 25 withdraw as counsel for Plaintiffs, ROCK N’ ROLL FOODS, LLC, and RICHARD “ROCKY”
 26 PARKS in the above-captioned matter, pursuant to Local Rule IA 10-6, S.C.R 46, and N.R.C.P.
 27 1.16(b)(1) and (7).
 28

1 This Motion is made and based upon the Memorandum of Points and Authorities submitted
2 herein, the Declaration of Elaine A. Dowling, Esq., attached hereto, the pleadings and papers on
3 file herein, and any argument at the hearing of this Motion to Withdraw as Counsel of Record.
4

5
6 Dated this 15th day of September, 2017.

7
8 **EAD LAW GROUP, LLC**

9 

10 ELAINE A. DOWLING, ESQ.

11 Nevada Bar No. 8051

12 6671 S. Las Vegas Blvd., Suite 210

13 Las Vegas, NV 89119

14 *Attorney for Plaintiffs*

15 **MEMORANDUM OF POINTS AND AUTHORITIES**

16 Ms. Dowling is no longer employed as an attorney with Harold P. Gewerter, Esq.
17 Furthermore, Ms. Dowling was not retained to represent Rock N' Roll Foods, LLC, and Richard
18 "Rocky" Parks as outside counsel, in the above-captioned matter, or any other pending case or
19 matter before this Court on behalf of Rock N' Roll Foods, LLC and Richard "Rocky" Parks. The
20 Local Rule IA 10-6(a) provides that "No attorney may withdraw after appearing in a case except
21 by leave of court after notice served on the affected client and opposing counsel." Rock N' Roll
22 received notice of Ms. Dowling's intent to withdraw from this case, upon Ms. Dowling's final
23 week of employment with Gewerter in 2016. On June 26, 2017, Ryan Anderson, Esq., was
24 substituted in as counsel of record in place of Harold P. Gewerter, Esq. The opposing parties in
25 this case will receive notice of this Motion to Withdraw, pursuant to the Certificate of Service
26 herein.
27
28

