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

9 Rock N’ Roll Foods, LLC; Richard “Rocky”
 Parks,
 10 Plaintiffs,

11 v.

12 Stephen Frazer; Emerging Technology
 Corporation; et al.,
 13 Defendants.

Case No. 2:15-cv-00988-JAD-DJA

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



14
 15 RYAN A. ANDERSEN, ESQ., respectfully moves this court for an order permitting RYAN A.
 16 ANDERSEN, ESQ. (“Mr. Andersen”) who has appeared in these proceedings, to withdraw as counsel
 17 for Plaintiffs, ROCK N’ ROLL FOODS, LLC and RICHARD “ROCKY” PARKS (“Plaintiffs”), in the
 18 above captioned matter, pursuant to Local Rule IA 10-6, S.C.R 46, and N.R.C.P. 1.16(b)(1) and (7).

19 This Motion is made and based upon the following Memorandum of Points and Authorities
 20 submitted herein, the Declaration of Ryan A. Andersen, Esq., the pleadings and papers on file herein,
 21 and any argument at the hearing of this Motion to Withdraw as Counsel of Record.

22 Dated this 11th day of October, 2023.

Respectfully submitted by:

ANDERSEN LAW FIRM, LTD.

23
 24
 25 By: /s/ Ryan A. Andersen
 Ryan A. Andersen, Esq.
 Nevada Bar No. 12321
 3199 E Warm Springs Road, Suite 400
 Las Vegas, Nevada 89120

DECLARATION

1 I, RYAN A. ANDERSEN, ESQ., declare under penalty of perjury, that the following is true
2 and correct:

3 1. I am an attorney at law admitted to practice in all courts of the State of Nevada. I have
4 personal knowledge of the facts set forth below and I believe them to be true. I am over eighteen years
5 old, and I am competent to testify to the matters set forth herein.

6 2. I represented, ROCK N’ ROLL FOODS, LLC and RICHARD “ROCKY” PARKS, in
7 the capacity of attorney, in the above referenced matter from filing date of my substitution of attorney
8 on until shortly after the case closed a little over six years ago.

9 3. I currently do not represent ROCK N’ ROLL FOODS, LLC and RICHARD “ROCKY”
10 PARKS, as counsel or in any capacity, on any pending matters before this Court.

11 Dated this 11th day of October, 2023

12 **ANDERSEN LAW FIRM, LTD.**
13 /s/ Ryan A. Andersen
14 RYAN A. ANDERSEN, ESQ.
15 Nevada Bar No. 12321
16 3199 E Warm Springs Road. Suite 400
Las Vegas, NV 89120

17 **MEMORANDUM OF POINTS AND AUTHORITIES**

18 Mr. Andersen’s representation of the Plaintiffs came to an end shortly after this case closed a
19 little over six years ago. As such, undersigned counsel no longer represents the Plaintiffs in any capacity.
20 The Local Rule IA 10-6(a) provides that “No attorney may withdraw after appearing in a case except by
21 leave of court after notice served on the affected client and opposing counsel.” The Plaintiffs and
22 opposing parties in this case will receive notice of this Motion to Withdraw, pursuant to the Certificate
23 of Service herein.

24 Additionally, Local Rule IA 10-6(e) provides that “no withdrawal... shall be approved if delay
25 of discovery, the trial, or any hearing in the case would result.” Here, no delay of any kind will result
26 from Mr. Andersen’s withdrawal because Plaintiffs’ judgment has been entered and this case closed a
27



1 little over six years ago. Thus, Mr. Andersen’s withdrawal will not prejudice any party or delay any
2 proceeding in this matter.

3 **CONCLUSION**

4 For the reasons set forth above, Mr. Andersen respectfully moves this Court to enter an Order
5 Approving the withdrawal of Mr. Andersen as attorney for ROCK N’ ROLL FOODS, LLC and
6 RICHARD “ROCKY” PARKS in the instant matter.

7 Date this 11th day of October, 2023.

8 **ANDERSEN LAW FIRM, LTD.**
9 /s/ Ryan A. Andersen
10 RYAN A. ANDERSEN, ESQ.
11 Nevada Bar No. 12321
12 3199 E Warm Springs Road, Suite 400
13 Las Vegas, NV 89120

14 **CERTIFICATE OF SERVICE**

15 Pursuant to Federal Rule of Civil Procedure 5(b), I hereby certify that on this 11th day of
16 October, 2023, I caused the MOTION AND PROPOSED ORDER TO WITHDRAW AS COUNSEL
17 OF RECORD and the DECLARATION OF RYAN A. ANDERSEN, ESQ., IN SUPPORT OF THE
18 MOTION TO WITHDRAW AS COUNSEL OF RECORD to be served by the Court’s CM/ECF
19 system. The above-named documents were also served to the following via U.S. Regular Mail:

20 Richard “Rock” Parks
21 2766 Duneville St
22 Las Vegas, NV 89146

23 Rock N’ Roll Foods, LLC
24 2766 Duneville St
25 Las Vegas, NV 89146

26 /s/ Melissa Rodriguez
27 Melissa Rodriguez, an employee
of Andersen Law Firm, Ltd.

28 **IT IS SO ORDERED.**

29 Dated: 10/18/2023

30 
31 UNITED STATES MAGISTRATE JUDGE

