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10 Attorneys for CGrowth Capital, Inc., William M.
 Wright, III, and Keystone Financial Management, Inc.

11 UNITED STATES DISTRICT COURT
 12 DISTRICT OF NEVADA

14 PHILIP WINGEN, et al.,

15 Plaintiffs,

16 v.

17 VENTRUM ENERGY CORP., et al.,

18 Defendants.

Case No. 2:15-cv-02043-JCM-VCF

**MOTION TO WITHDRAW AS
 ATTORNEYS OF RECORD FOR
 CGROWTH CAPITAL, INC.,
 WILLIAM M. WRIGHT, III, AND
 KEYSTONE FINANCIAL
 MANAGEMENT, INC.**

20 COMES NOW Gary I. Grenley and Eryn Karpinski Hoerster of the law firm of Garvey
 21 Schubert Barer and hereby moves to withdraw as attorneys for Defendants CGrowth Capital, Inc.,
 22 Keystone Financial Management, Inc., and William M. Wright, III (“Defendants”) in the above-
 23 captioned matter.

24 This motion is made and based upon the papers and pleadings on file herein, the following
 25 points and authorities, and Declaration of Eryn Karpinski Hoerster attached hereto.

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1 The Defendants will continue to be represented by attorney of record Frederick C.
2 Bauman.

3 Dated: March 9, 2018

GARVEY SCHUBERT BARER

5 By: /s/ Eryn Karpinski Hoerster

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Attorneys for CGrowth Capital, Inc., Keystone
Financial Management, Inc., and William M.
Wright, III

14 IT IS SO ORDERED:



16 UNITED STATES MAGISTRATE JUDGE

17 DATED: March 28, 2018

19 **MEMORANDUM OF POINTS AND AUTHORITIES**

20 The Court should grant Garvey Schubert Barer's application to withdraw as attorneys of
21 record for Defendants CGrowth Capital, Inc., Keystone Financial Management, Inc. and William
22 M. Wright, III pursuant to the Nevada Rules of Professional Conduct ("NRPC") 1.16 and LR IA
23 11-6. As set forth in the Declaration of Eryn Karpinski Hoerster attached hereto, notice of
24 Garvey Schubert Barer's motion to Withdraw was mailed to Plaintiffs and all Defendants on
25 March 9, 2018, and Garvey Schubert Barer has good cause to withdraw.

26 NRPC 1.16 provides, in pertinent part, that a lawyer may withdraw from representation
27 where:

- 1 (1) Withdrawal can be accomplished without material adverse effect on the
- 2 interests of the client;
- 3 ...
- 4 (6) The representation will result in unreasonable financial burden on the
- 5 lawyer or has been rendered unreasonably difficult by the client; or
- 6 (7) Other good cause exists for withdrawal.

7 NRPC 1.16(b).

8 The attached Declaration of Eryn Karpinski Hoerster is incorporated herein by reference
9 and establishes that good cause exists for the withdrawal of Garvey Schubert Barer as counsel
10 for Defendants, and that the withdrawal can be accomplished without adversely affecting the
11 interest of the clients.

12 WHEREFORE, the undersigned respectfully requests that this court enter an order
13 approving the withdrawal of Garvey Schubert Barer as attorneys of record for Defendants, and
14 for such other and further relief as the Court deems just and proper.

15 Dated: March 9, 2018

GARVEY SCHUBERT BARER

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By: /s/ Eryn Karpinski Hoerster
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Attorneys for CGrowth Capital, Inc., Keystone
Financial Management, Inc., and William M.
Wright, III

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1 **CERTIFICATE OF SERVICE**

2 I hereby certify that I served the foregoing **MOTION TO WITHDRAW AS**
3 **ATTORNEYS OF RECORD FOR CGROWTH CAPITAL, INC., WILLIAM M.**
4 **WRIGHT, III, AND KEYSTONE FINANCIAL MANAGEMENT, INC.** on all counsel of
5 record by the following indicated method or methods on the date set forth below:

6 Via Electronic Court Filing:

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8 Garman Turner Gordon LLP
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28 Via United States First Class Mail:

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Catherine Elkins
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Las Vegas, NV 89113

DATED this 9th day of March, 2018.

/s/ Eryn Karpinski Hoerster

Eryn Karpinski Hoerster
(admitted Pro Hac Vice)

GSB:9317067.1