1				
2	Frederick C. Bauman (Nev. Bar No. 8370) 6640 Sky Pointe Dr., Ste 140-149			
3	Las Vegas, NV 89131 Telephone: (702) 533-8372			
4	Facsimile:No Fax NumberEmail: fred@lawbauman.com			
5	GARVEY SCHUBERT BARER			
6	Gary I. Grenley (Pro Hac Vice) Eryn Karpinski Hoerster (Pro Hac Vice)			
7	121 SW Morrison Street, 11 th Floor Portland, Oregon 97204-3141			
8	Telephone: (503) 228-3939 Facsimile: (503) 226-0259			
9	Email: <u>ggrenley@gsblaw.com</u> <u>ehoerster@gsblaw.com</u>			
10	Attorneys for CGrowth Capital, Inc., William M.			
11	Wright, III, and Keystone Financial Management, Inc.			
12	UNITED STATES DISTRICT COURT			
13	DISTRICT OF NEVADA			
14				
15	PHILIP WINGEN, et al.,	Case No. 2:15-cv-02043-JCM-VCF		
16	Plaintiffs,	MOTION TO WITHDRAW AS ATTORNEYS OF RECORD FOR		
17		CGROWTH CAPITAL, INC., WILLIAM M. WRIGHT, III, AND		
18	VENTRUM ENERGY CORP., et al.,	KEYSTONE FINANCIAL MANAGEMENT, INC.		
19	Defendants.			
20	COMES NOW Gary I. Grenley and Ery	n 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 Will	iam M. Wright, III ("Defendants") in the above-		
23				
24	captioned matter.			
25	This motion is made and based upon the papers and pleadings on file herein, the following			
26	points and authorities, and Declaration of Eryn K	arpinski Hoerster attached hereto.		
27	////			
28		l -		
		OF RECORD FOR CGROWTH CAPITAL, INC., ONE FINANCIAL MANAGEMENT, INC.		

1	The Defendants will continue to be represented by attorney of record Frederick C.
2	Bauman.
3	Dated: March 9, 2018 GARVEY SCHUBERT BARER
4	
5	By: /s/ Eryn Karpinski Hoerster Gary I. Grenley (Pro Hac Vice)
6	Eryn Karpinski Hoerster (Pro Hac Vice)
7	121 SW Morrison Street, 11th Floor Portland, Oregon 97204-3141
8	Telephone:(503) 228-3939 Facsimile: (503) 226-0259
9	Email: ggrenley@gsblaw.com ehoerster@gsblaw.com
10	Attorneys for CGrowth Capital, Inc., Keystone
11	Financial Management, Inc., and William M. Wright, III
12	
13	
14	IT IS SO OPDERED:
15	Contracte.
16	UNITED STATES MAGISTRATE JUDGE
17	DATED:March 28, 2018
18	
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	NPRC 1.16 provides, in pertinent part, that a lawyer may withdraw from representation
27	where:
28	-2-
	MOTION TO WITHDRAW AS ATTORNEYS OF RECORD FOR CGROWTH CAPITAL, INC., WILLIAM M. WRIGHT, III, AND KEYSTONE FINANCIAL MANAGEMENT, INC.

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 lawyer or has been rendered unreasonably difficult by the client; or	
5	(7) Other good cause exists for withdrawal.	
6 7	NRPC 1.16(b).	
8	The attached Declaration of Eryn Karpinski Hoerster is incorporated herein by reference	
9		
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, 2018GARVEY SCHUBERT BARER	
16	By: /s/ Eryn Karpinski Hoerster	
17	Gary I. Grenley (Pro Hac Vice)	
18	Eryn Karpinski Hoerster (Pro Hac Vice) 121 SW Morrison Street, 11th Floor	
19	Portland, Oregon 97204-3141 Telephone:(503) 228-3939	
20 21	Facsimile: (503) 226-0259 Email: ggrenley@gsblaw.com	
22	ehoerster@gsblaw.com	
23	Attorneys for CGrowth Capital, Inc., Keystone Financial Management, Inc., and William M. Wright, III	
24	Wiight, III	
25		
26		
27		
28	- 3 -	
	MOTION TO WITHDRAW AS ATTORNEYS OF RECORD FOR CGROWTH CAPITAL, INC., WILLIAM M. WRIGHT, III, AND KEYSTONE FINANCIAL MANAGEMENT, INC.	

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DECLARATION OF ERYN KARPINSKI HOERSTER IN SUPPORT OF MOTION TO WITHDRAW AS ATTORNEY OF RECORD

I, Eryn Karpinski Hoerster, declare in support of this Motion to Withdraw as Attorney of Record:

I am an attorney admitted pro hac vice, I am a principal in the law firm of Garvey
Schubert Barer, and am one of the attorneys of record for Defendants in the instant matter.

7 2. I make this declaration in support of the Motion to Withdraw as Attorneys of
8 Record in the matter styled Philip Wingen, et al. v. Ventrum Energy Corp., et al., filed in the
9 United States District Court, District of Nevada, Case No. 2:15-cv-02043-JCM-VCF.

3. On or about April 21, 2017, Defendants entered into an engagement agreement
 with Garvey Schubert Barer in which Garvey Schubert Barer has represented Defendants in this
 action pursuant to its terms.

4. Garvey Schubert Barer has performed its obligations as counsel for Defendants in
a skillful and diligent manner. Defendants have failed to meet substantial obligations owed to
Garvey Schubert Barer. These failures require Garvey Schubert Barer to withdrawal as counsel.
This Motion is brought in good faith and not for purposes of any delay.

5. Defendants will continue to be represented by Nevada counsel, Mr. Frederick C.
Bauman, whose address is 6640 Sky Pointe Dr., Ste 140-149, Las Vegas, NV 89131, and
Telephone number (702) 533-8372.

20 6. Defendants were provided notice of Garvey Schubert Barer's intent to file the
21 Motion to Withdraw on February 28, 2018. Prior to that, Garvey Schubert Barer notified
22 Defendants on February 16, 2018, that financial obligations would need to be brought current for
23 Garvey Schubert Barer to continue representation.

7. I declare under penalty of perjury of the laws of the State of Oregon that the
foregoing is true and correct.

Executed this 9th day of March, 2018.

<u>/s/ Eryn Karpinski Hoerster</u> Eryn Karpinski Hoerster

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<u>CERTIFICATE OF SERVICE</u>		
I hereby certify that I served the foregoing MOTION TO WITHDRAW AS		
ATTORNEYS OF RECORD FOR CGROWTH CAPITAL, INC., WILLIAM M.		
WRIGHT, III, AND KEYSTONE FINANCIAL MANAGEMENT, INC. on all counsel of		
record by the following indicated met	thod or methods on the date set forth below:	
Via Electronic Court Filing:		
Dylan T. Ciciliano Garman Turner Gordon LLP		
650 White Drive Suite 101		
Las Vegas, NV 89119		
Email: <u>dciciliano@gtg.legal</u>		
Nik Skrinjaric Nik Skrinjaric Attorney at Law		
8430 West Lake Mead Blvd., Ste. 10 Las Vegas, NV 89128	0	
Email: <u>ns@nvlaw.biz</u>		
Fara Daun Stellar Pacific Business Law PLLC		
9505 19 th Ave. SE, Suite 109 Everett, WA 98208		
Email: fara@stellarpacificlaw.com		
Frederick C Bauman Bauman & Associates		
5595 Egan Crest Dr. Las Vegas, NV 89149		
Email: fred@lawbauman.com		
Via United States First Class Mail:		
Avihail Kochlani		
5855 Shirley Avenue Tarzana, CA 91356		
Catherine Elkins		
7866 S. Miller Lane Las Vegas, NV 89113		
-		
DATED this 9th day of	March, 2018.	
	/s/ Eryn Karpinski Hoerster	
CCD 00170/7 1	Eryn Karpinski Hoerster (admitted Pro Hac Vice)	
GSB:9317067.1		