

1 DAVID T. BLAKE (# 11059)
 Counsel for Summit Estate Inc.
 2 1671 W. Horizon Ridge Parkway, Suite 200
 3 Henderson, NV 89012
 Phone: (702) 476-5900
 4 dave@clearcounsel.com

5 **UNITED STATES DISTRICT COURT**
 6 **NORTHERN DISTRICT OF NEVADA**

7 PAUL PONOMARENKO, an individual,
 8 Plaintiff,
 9 v.
 10 PROJECT VEGAS MANSION, corporate entity
 of unknown form, NATHAN SHAPIRO, an
 11 individual; and DOES 1 through 50,
 12 Defendants.

Case No.: 2:18-cv-00216-RFB-CWH

**MOTION TO PERMIT WITHDRAWAL
 OF CALIFORNIA COUNSEL SANJIV N.
 SINGH AND MICHAEL INDRAJANA AND
 TO PERMIT SUBSTITUTION OF NEW
 COUNSEL FOR SUMMIT ESTATE, INC.
 AND PAUL PONOMARENKO**

14 NATHAN SHAPIRO, an individual,
 15 Counterclaimant,
 16 v.
 17 PAUL PONOMARENKO, an individual, DOES
 18 1 through 50 and ROE business entities 51-100,
 19 Counterdefendants.

20 NATHAN SHAPIRO, an individual,
 21 Third Party Plaintiff,
 22 vs.
 23 SUMMIT ESTATE, INC. DBA SUMMIT
 24 ESTATE RECOVERY CENTER, a California
 corporation; LUKE GERHARD KROGH, an
 25 individual; DOES 1 through 50 and ROE business
 entities 51 through 100,
 26 Third Party Defendants.
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TO THE COURT AND ALL PARTIES AND THEIR COUNSEL OF RECORD:

PLEASE TAKE NOTICE that Plaintiff Paul Ponomarenko and Third-Party Defendant Summit Estate, Inc. hereby move the Court for an order permitting withdrawal of California counsel Sanjiv Nand Singh and Michael Budi Indrajana as counsel of record and permitting the filing of a substitution of counsel whereby David T. Blake, Esq. will assume representation for both Mr. Ponomarenko and Summit Estate, Inc.

This motion is made pursuant to Local Rule IA 11-6 and in response to the Court's order (Dkt. No. 115) requiring that Summit Estate Inc. locate counsel and have California Counsel Sanjiv Singh and Michael Indrajana appear pro hac vice. Mr. Blake will assume representation for both Summit Estate and Paul Ponomarenko, thereby obviating the need to have local counsel appear pro hac vice.

This motion is based on this Notice of Motion and Motion; the accompanying Memorandum of Points and Authorities, the accompanying Declaration of Paul Ponomarenko, and such other matters as may be presented to the Court at the time of the hearing (if one is required); and such other and further evidence and arguments as the Court may properly consider.

DATED: July 20, 2018.

Respectfully submitted,

By: /s/ David T. Blake
David T. Blake, Esq. (#11059)
Counsel for Plaintiff Paul Ponomarenko and
Third-Party Defendant Summit Estate, Inc.

1 **CERTIFICATE OF SERVICE**

2 **I HEREBY CERTIFY** that on the 20th day of July, 2018, I served a true and accurate copy
3 of the foregoing MOTION TO PERMIT WITHDRAWAL OF CALIFORNIA COUNSEL SANJIV
4 N. SINGH AND MICHAEL INDRAJANA AND TO PERMIT SUBSTITUTION OF NEW
5 COUNSEL FOR SUMMIT ESTATE, INC. AND PAUL PONOMARENKO through the Court's
6 CM/ECF system, and via email, to the following parties:
7

8 Thomas Shaddix
9 Counsel for Defendant Nathan Shapiro
10 6166 S. Sandhill Road, Suite 146
11 Las Vegas, NV 89120
12 Phone: (702) 735-7867
13 thomas@shaddixlaw.com

14 David T. Blake, Esq.
15 Counsel for Summit Estate Inc.
16 1671 W. Horizon Ridge Parkway, Suite 200
17 Henderson, NV 89012
18 Phone: (702) 476-5900
19 dave@clearcounsel.com

20 Sanjiv N. Singh, Esq.
21 Sanjiv N. Singh, a PLC
22 1650 S. Amphlett Blvd. Suite 220
23 San Mateo, CA 94402
24 Phone: (650) 389-2255
25 Email: ssingh@sanjivnsingh.com

26 Michael Indrajana, Esq.
27 Indrajana Law Group, a PLC
28 1650 S. Amphlett Blvd. Suite 220
San Mateo, CA 94402
Phone: (650) 597-0928
Email: michael@indrajana.com

Paul Ponomarenko
1650 S. Amphlett Blvd. Suite 220
San Mateo, CA 94402
Phone: (650) 597-0928
Email: paul@summitestate.com

IT IS SO ORDERED.

DATED: July 24, 2018


C.W. HOFFMAN, JR.
UNITED STATES MAGISTRATE JUDGE

/s/ K.A. Gentile
An Employee of Clear Counsel Law Group

EXHIBIT “A”

EXHIBIT “A”

EXHIBIT “B”

EXHIBIT “B”

1 David T. Blake, Esq. (# 11059)
2 **CLEAR COUNSEL LAW GROUP**
3 1671 W. Horizon Ridge Parkway, Suite 200
4 Henderson, Nevada 89012
5 (702) 476-5900
6 (702) 924-0709 (Fax)
7 dave@clearcounsel.com
8 Attorneys for Summit Estate, Inc. dba
9 Summit Estate Recovery Center

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

8 PAUL PONOMARENKO, an individual,
9
10 Plaintiff,

11 vs.

12 PROJECT VEGAS MANSION, corporate
13 entity of unknown form, NATHAN
14 SHAPIRO, an individual; and DOES 1
15 through 50,

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17 Defendants

18 NATHAN SHAPIRO, an individual,
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20 Counterclaimant,

21 vs.

22 PAUL PONOMARENKO, an individual,
23 DOES 1 THROUGH 50 and ROE business
24 entities 51 through 100.

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26 Counterdefendants.

27 NATHAN SHAPIRO, an individual,

28 Third-Party Plaintiff,

vs.

SUMMIT ESTATE, INC., DBA SUMMIT
ESTATE RECOVERY CENTER, a
California corporation, LUKE GERHARD
KROGH an individual, DOES 1 through 50
and ROE business entities 51 through 100.

Third-Party Defendants.

Case No. 2:18-CV-00216-RFB-CWH

SUBSTITUTION OF ATTORNEY

1 Sanjiv N. Singh, hereby consents to the substitution of David T. Blake of Clear Counsel Law
2 Group, as attorney of record for Paul Ponomarenko and Summit Estate, Inc. in place of Sanjiv N.
3 Singh Professional Law Corporation in the above captioned matter.
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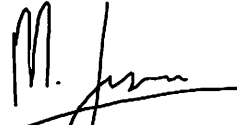
5 Dated: July 19, 2018.



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7 Sanjiv N. Singh, Esq.
8 Sanjiv N. Singh Professional Law Corporation

9 Michael B. Indrajana hereby consents to the substitution of David T. Blake of Clear Counsel
10 Law Group, as attorney of record for Paul Ponomarenko and Summit Estate, Inc. in place of Indrajana
11 Law Group, A Professional Law Corporation., in the above captioned matter.

12 Dated: July 19, 2018.



13
14 Michael B. Indrajana, Esq.
15 Indrajana Law Group, A Professional Law Corp.

16 Paul Ponomarenko hereby consents to the substitution of David T. Blake of Clear Counsel
17 Law Group, as attorney of record in the above captioned matter, in place of Sanjiv N. Singh, A
18 Professional Law Corp and Indrajana Law Group, A Professional Law Corporation and Mr.
19 Ponomarenko pro per, to represent Mr. Ponomarenko individually.

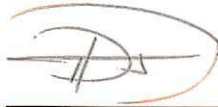
20 Dated: July 19, 2018.



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22 Paul Ponomarenko, an individual

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24 Paul Ponomarenko, on behalf of Summit Estate, Inc., hereby consents to the substitution of
25 David T. Blake of Clear Counsel Law Group, as attorney of record for Summit Estate, Inc. in place of
26 Sanjiv N. Singh, A Professional Law Corp and Indrajana Law Group, A Professional Law Corporation
27 in the above captioned matter.

28 Dated: July 19, 2018.



Paul Ponomarenko
Owner, Summit Estate Inc.

David T. Blake of the law firm Clear Counsel Law Group hereby accepts the above substitution of attorneys in the above captioned matter. I have been retained by the parties and am duly admitted to practice in this District.

Dated: July 19, 2018.

CLEAR COUNSEL LAW GROUP

David T. Blake (#11059)

APPROVED:

Dated:

UNITED STATES DISTRICT JUDGE

1 DAVID T. BLAKE (#11059)
2 Counsel for Summit Estate Inc.
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Third Party Defendants.

Case No.: 2:18-cv-00216-RFB-CWH

**[PROPOSED ORDER] RE MOTION TO
PERMIT WITHDRAWAL OF
CALIFORNIA COUNSEL SANJIV N.
SINGH AND MICHAEL INDRAJANA
AND TO PERMIT SUBSTITUTION OF
NEW COUNSEL FOR SUMMIT ESTATE,
INC. AND PAUL PONOMARENKO**

1 **PROPOSED ORDER**

2 Pursuant to Local Rule IA 11-6, Plaintiff Paul Ponomarenko and Third-Party Defendant
3 Summit Estate Inc. moved for permission to substitute in Mr. David Blake as their Nevada counsel
4 in the above captioned matter and permitting withdrawal of their California counsel. Local Rule IA
5 11-6; *see also* Declaration of Paul Ponomarenko In Support of Motion (Ponomarenko Declaration)
6 at ¶ 2.

7 Having considered the Motion and supporting materials, the Court finds good cause and the
8 Motion is GRANTED.

9 IT IS SO ORDERED.

10 DATED: July 2018.

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12 By: _____

13 U.S. Magistrate Judge
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