1	DAVID T. BLAKE (# 11059)	
2	Counsel for Summit Estate Inc. 1671 W. Horizon Ridge Parkway, Suite 200	
3	Henderson, NV 89012 Phone: (702) 476-5900	
4	<u>dave@clearcounsel.com</u>	
5	UNITED STATES I	DISTRICT COURT
6	NORTHERN DISTI	RICT OF NEVADA
7	PAUL PONOMARENKO, an individual,	Case No.: 2:18-cv-00216-RFB-CWH
8	Plaintiff,	
9	v.	MOTION TO PERMIT WITHDRAWAL
10	PROJECT VEGAS MANSION, corporate entity of unknown form, NATHAN SHAPIRO, an	OF CALIFORNIA COUNSEL SANJIV N. SINGH AND MICHAEL INDRAJANA AND
11	individual; and DOES 1 through 50,	TO PERMIT SUBSTITUTION OF NEW COUNSEL FOR SUMMIT ESTATE, INC.
12	Defendants.	AND PAUL PONOMARENKO
13		
14	NATHAN SHAPIRO, an individual,	
15	Counterclaimant,	
16	V.	
17	PAUL PONOMARENKO, an individual, DOES 1 through 50 and ROE business entities 51-100,	
18		
19	Counterdefendants.	
20	NATHAN SHAPIRO, an individual,	
21	Third Party Plaintiff,	
22	vs.	
23	SUMMIT ESTATE, INC. DBA SUMMIT ESTATE RECOVERY CENTER, a California	
24	corporation; LUKE GERHARD KROGH, an	
25 26	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.

MEMORANDUM OF POINTS AND AUTHORITIES

Pursuant to Local Rule IA 11-6, Plaintiff Paul Ponomarenko and Third-Party Defendant Summit Estate Inc. are requesting permission to substitute in Mr. David Blake as their Nevada counsel in the above captioned matter. Local Rule IA 11-6; *see also* Declaration of Paul Ponomarenko In Support of Motion (Ponomarenko Declaration) at ¶ 2 attached herein as <u>Exhibit A</u>. California counsel Sanjiv Singh and Michael Budi Indrajana are not admitted in Nevada, and while the Plaintiff was considering having them appear pro hac vice initially, it is now apparent that pro hac vice appearances and/or representation is not necessary as Nevada counsel has been located who can take over representation for all purposes. Id. Mr. Blake has already filed a notice of appearance for Summit Estate, Inc. All that is needed at this time is for the court to grant this motion and authorize filing of a true and correct copy of the attached substitution of counsel attached herein as <u>Exhibit B</u>.

Plaintiff Ponomarenko and Third-Party Defendant Summit Estate Inc. therefore move the court for the authorization to file the aforementioned substitution of counsel and permit withdrawal of California counsel who had been counsel of record when the matter was pending in California. A copy of the proposed order is filed concurrently.

DATED: July 20, 2018.

Respectfully submitted,

By:

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

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1	CEDTIEK	TATE OF SEDVICE
1	<u>CERTIFICATE OF SERVICE</u>	
2 3	I HEREBY CERTIFY that on the 20th day of July, 2018, I served a true and accurate copy	
4	of the foregoing MOTION TO PERMIT WITHDRAWAL OF CALIFORNIA COUNSEL SANJIV	
5	N. SINGH AND MICHAEL INDRAJANA AND TO PERMIT SUBSTITUTION OF NEW	
6	COUNSEL FOR SUMMIT ESTATE, INC. AND PAUL PONOMARENKO through the Court's	
7	CM/ECF system, and via email, to the following parties:	
8	Thomas Shaddix Counsel for Defendant Nathan Shapiro	
9 10	6166 S. Sandhill Road, Suite 146 Las Vegas, NV 89120 Phone: (702) 735-7867	
11	thomas@shaddixlaw.com	
12	David T. Blake, Esq.	
13	Counsel for Summit Estate Inc. 1671 W. Horizon Ridge Parkway, Suite 200	
14	Henderson, NV 89012 Phone: (702) 476-5900	
15		IT IS SO ORDERED.
16	Sanjiv N. Singh, Esq.	DATED: July 24, 2018
17	Sanjiv N. Singh, a PLC 1650 S. Amphlett Blvd. Suite 220	
18	San Mateo, CA 94402 Phone: (650) 389-2255	Curst
19		C.W. HOFFMAN JR.
20	Michael Indrajana, Esq.	UNITED STATES MAGISTRATE JUDGE
21	Indrajana Law Group, a PLC 1650 S. Amphlett Blvd. Suite 220	
22	San Mateo, CA 94402 Phone: (650) 597-0928	
23 24	Email: michael@indrajana.com	
25	Paul Ponomarenko	
26	1650 S. Amphlett Blvd. Suite 220 San Mateo, CA 94402	
27	Phone: (650) 597-0928 Email: paul@summitestate.com	
28		/s/ K.A.Gentile An Employee of Clear Counsel Law Group

EXHIBIT "A"

EXHIBIT "A"

DECLARATION OF PAUL PONOMARENKO I, Paul Ponomarenko, declare as follows: 1. I am the owner of Summit Estate, Inc. I am also the Plaintiff in this matter. I have personal knowledge of the facts in this Declaration, and can testify competently to the facts contained herein. 2. California counsel Sanjiv Singh and Michael Budi Indrajana are not admitted in Nevada, and while I was considering having them appear pro hac vice initially because they were my California counsel in this matter, it is now apparent that pro hac vice appearances and/or representation is not necessary as Nevada counsel has been located who can take over representation for all purposes. Mr. Blake has already filed a notice of appearance for Summit Estate, Inc. I have spoken personally with Mr. Blake, and feel comfortable that he can assume representation with duplicating efforts by also having pro hac vice counsel appear as well. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed this July 19, 2018 in Santa Clara, California. PAUL PONOMARENKO

EXHIBIT "B"

EXHIBIT "B"

1	David T. Blake, Esq. (# 11059)	
2	CLEAR COUNSEL LAW GROUP 1671 W. Horizon Ridge Parkway, Suite 200	
3	Henderson, Nevada 89012 (702) 476-5900	
4	(702) 924-0709 (Fax) dave@clearcounsel.com	
5	Attorneys for Summit Estate, Inc. dba	
6		S DISTRICT COURT
7	DISTRICI	SOF NEVADA
8	PAUL PONOMARENKO, an individual,	Case No. 2:18-CV-00216-RFB-CWH
9	Plaintiff,	
10	VS.	SUBSTITUTION OF ATTORNEY
11	PROJECT VEGAS MANSION, corporate	
12	entity of unknown form, NATHAN SHAPIRO, an individual; and DOES 1	
13	through 50,	
14	Defendants	
15	NATHAN SHAPIRO, an individual,	
16	Counterclaimant,	
17	vs.	
18	PAUL PONOMARENKO, an individual,	
19	DOES 1 THROUGH 50 and ROE business entities 51 through 100.	
20	Counterdefendants.	
21	NATHAN SHAPIRO, an individual,	
22		
23	Third-Party Plaintiff,	
24	vs.	
25	SUMMIT ESTATE, INC., DBA SUMMIT ESTATE RECOVERY CENTER, a	
26	California corporation, LUKE GERHARD KROGH an individual, DOES 1 through 50	
27 28	and ROE business entities 51 through 100.	
20	Third-Party Defendants.	
	1	

CLEAR COUNSEL

Sanjiv N. Singh, hereby consents to the substitution of David T. Blake of Clear Counsel Law Group, as attorney of record for Paul Ponomarenko and Summit Estate, Inc. in place of Sanjiv N. Singh Professional Law Corporation in the above captioned matter.

Dated: July 19, 2018.

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

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

Dated: July 19, 2018.

Michael B. Indrajana, Esq. Indrajana Law Group, A Professional Law Corp.

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

Dated: July 19, 2018.

Paul Ponomarenko, an individual

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

Dated: July 19, 2018.

1	- As
2	Paul Ponomarenko
3	Owner, Summit Estate Inc.
4	
5	David T. Blake of the law firm Clear Counsel Law Group hereby accepts the above
6	substitution of attorneys in the above captioned matter. I have been retained by the parties and an
7	duly admitted to practice in this District.
8	Dated: July 19, 2018.
9	CLEAR COUNSEL LAW GROUP
10	
11	End BCC
12	David T. Blake (#11059)
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14	APPROVED:
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15	Dated: UNITED STATES DISTRICT JUDGE
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1	A la

1	DAVID T. BLAKE (#11059)	
2	Counsel for Summit Estate Inc. 1671 W. Horizon Ridge Parkway, Suite 200	
3	Henderson, NV 89012	
4	Phone: (702) 476-5900 dave@clearcounsel.com	
5	UNITED STATES D	ISTRICT COURT
6	NORTHERN DISTR	LICT OF NEVADA
7	PAUL PONOMARENKO, an individual,	Case No.: 2:18-cv-00216-RFB-CWH
8	Plaintiff,	
9	v.	
10	PROJECT VEGAS MANSION, corporate entity	[PROPOSED ORDER] RE MOTION TO PERMIT WITHDRAWAL OF
11	of unknown form, NATHAN SHAPIRO, an individual; and DOES 1 through 50,	CALIFORNIA COUNSEL SANJIV N.
12	Defendants.	SINGH AND MICHAEL INDRAJANA AND TO PERMIT SUBSTITUTION OF
13		NEW COUNSEL FOR SUMMIT ESTATE, INC. AND PAUL PONOMARENKO
14	NATHAN SHAPIRO, an individual,	
15	Counterclaimant,	
16	V.	
17	PAUL PONOMARENKO, an individual, DOES 1	
18	through 50 and ROE business entities 51-100,	
19	Counterdefendants.	
20	NATHAN SHAPIRO, an individual,	
21	Third Party Plaintiff,	
22	v.	
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	
26	entities 51 through 100,	
27	Third Party Defendants.	
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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; <i>see also</i> 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.	
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10	IT IS SO ORDERED.	
11	DATED: July 2018.	
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13	By:	
14	U.S. Magistrate Judge	
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1	CERTIFICATE OF SERVICE	
2	I HEREBY CERTIFY that on the 20th day of July 20, 2018, I served a true and accurate	
3	copy of the foregoing PROPOSED ORDER through the Court's CM/ECF system, and via email, to	
4	the following parties:	
5	Thomas Shaddix	
6	Counsel for Defendant Nathan Shapiro 6166 S. Sandhill Road, Suite 146	
7	Las Vegas, NV 89120 Phone: (702) 735-7867	
8	thomas@shaddixlaw.com	
9		
10	David T. Blake, Esq. Counsel for Summit Estate Inc.	
11	1671 W. Horizon Ridge Parkway, Suite 200 Henderson, NV 89012	
12	Phone: (702) 476-5900	
13	<u>dave@clearcounsel.com</u>	
14	Sanjiv N. Singh, Esq.	
15	Sanjiv N. Singh, a PLC 1650 S. Amphlett Blvd. Suite 220	
16	San Mateo, CA 94402 Phone: (650) 389-2255	
17	Email: <u>ssingh@sanjivnsingh.com</u>	
18		
19	Michael Indrajana, Esq. Indrajana Law Group, a PLC	
20	1650 S. Amphlett Blvd. Suite 220 San Mateo, CA 94402	
21	Phone: (650) 597-0928	
22	Email: <u>michael@indrajana.com</u>	
23	Paul Ponomarenko 1650 S. Amphlett Blvd. Suite 220	
24	San Mateo, CA 94402 Phone: (650) 597-0928	
25	Email: paul@summitestate.com	
26	/s/K.A.Gentile An Employee of Clear Counsel Law Group	
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28		