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 9 *Attorneys for Defendant*

10 **UNITED STATES DISTRICT COURT**
 11 **DISTRICT OF NEVADA**

13 THE HERTZ CORPORATION, 14 Plaintiff, 15 vs. 16 MARCOS ALEJANDRO LEON-SANCHEZ, 17 WHITNEY MILIAN-CONCEPCION, 18 DENNIS LEONARDO RECONCO 19 UMANZOR, JUAN MANUEL NINO 20 BASTOS and ERODDYS CARRILLO DIAZ, 21 Defendants.) CASE NO.: 2:20-CV-01561-APG-BNW) <u>MOTION AND PROPOSED ORDER TO</u> <u>WITHDRAW AS COUNSEL OF RECORD</u>) [HEARING NOT REQUESTED]
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22 **MOTION AND PROPOSED ORDER TO WITHDRAW AS COUNSEL OF RECORD**

23 DAVID A. TANNER, ESQ., respectfully moves this court for an order permitting David
 24 A. Tanner, Esq. ("Mr. Tanner"), who has appeared in these proceedings, to withdraw as counsel
 25 for ERODDYS CARRILLO DIAZ ("Mr. Diaz"), in the above captioned matter, pursuant to Local
 26 Rule IA 11-6, S.C.R 46, and NRC.P 1.16(b)(1) and (7).

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28 ...

1 This Motion is made and based upon the Memorandum of Points and Authorities
2 submitted herein, the Declaration of David A. Tanner, Esq., attached hereto, the pleadings and
3 papers on file herein, and any argument adduced at the hearing of this Motion to Withdraw as
4 Counsel of Record.

5
6 DATED this 25 date of October, 2021.

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9
10 By: 

11 DAVID A. TANNER, Esq.
12 Nevada Bar No. 8282
13 **TANNER CHURCHILL ANDERSON**
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19 *Attorneys for Plaintiff*
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1 I.

2 MEMORANDUM OF POINTS AND AUTHORITIES

3 This is an action claiming damages sustained from a motor vehicle accident that occurred
4 on October 31, 2019.

5 Defendant's counsel, Mr. Tanner has no involvement and has not been handling this case.
6 David Churchill, Esq. and Jared Anderson, Esq. are the lead attorneys handling this case.

7 Additionally, Local Rule IA 11-6 (e) provides that "no withdrawal... shall be approved if
8 delay of discovery, the trial or any hearing in the case would result." Here, no delay of any kind
9 will result from Mr. Tanner's withdrawal because the pretrial order deadline is not until December
10 29, 2021. Mr. Tanner's withdrawal will not prejudice either party or delay any proceeding in this
11 matter.

12 II.

13 CONCLUSION

14 For the reasons set forth above, Mr. Tanner respectfully moves this Court to enter an Order
15 approving the withdrawal of Mr. Tanner as a representing attorney for Mr. Diaz in the instant
16 matter.

17
18 DATED this 25 date of August, 2021.

19
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21
22 By:


23 DAVID A. TANNER, Esq.

Nevada Bar No. 8282

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4001 Meadows Lane

Las Vegas, NV 89107

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Attorneys for Plaintiff

24 Order

25 **IT IS SO ORDERED**

26 **DATED:** 2:53 pm, October 26, 2021

27 

28 **BRENDA WEKSLER**

UNITED STATES MAGISTRATE JUDGE

1 DAVID A. TANNER, Esq.
Nevada Bar No. 8282
2 DAVID J. CHURCHILL, Esq.
Nevada Bar No. 7308
3 JARED B. ANDERSON, Esq.
Nevada Bar No. 9747

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10 **UNITED STATES DISTRICT COURT**

11 **DISTRICT OF NEVADA**

12 THE HERTZ CORPORATION,

13 Plaintiff,

14 vs.

15
16 MARCOS ALEJANDRO LEON-SANCHEZ,
WHITNEY MILIAN-CONCEPCION,
17 DENNIS LEONARDO RECONCO
UMANZOR, JUAN MANUEL NINO
18 BASTOS and ERODDYS CARRILLO
DIAZ,

19
20 Defendants.

) CASE NO.: 2:20-CV-01561-APG-BNW

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

22 **[HEARING NOT REQUESTED]**

23 COMES NOW, DAVID A. TANNER, ESQ., who after first being duly sworn, deposes
24 and says:

25 1. That the declared is counsel of record for Defendant in the above referenced
26 matter.

27 2. That the declared is applying to withdraw as counsel of record in this matter as he
28 is not the handling attorney in this case.

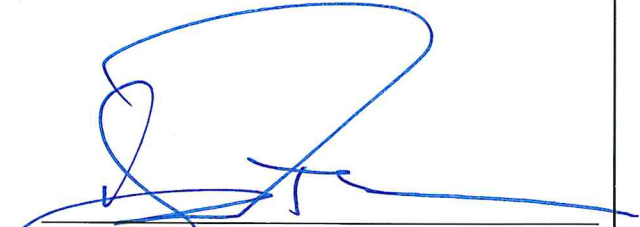
3. The Amended Complaint in this matter was filed on December 14, 2020.

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4. The Stipulated Discovery Plan and Scheduling Order was ordered on May 4, 2021.


5. Accordingly, Defendant's counsel is seeking to be relieved of his duties as counsel of record in this case.

DATED this 24 date of October, 2021.

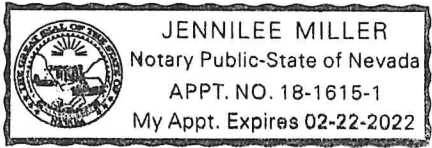


DAVID A. TANNER, ESQ.

SUBSCRIBED and SWORN to before me this 25 day of October, 2021.



NOTARY PUBLIC in and for said
County and State



CERTIFICATE OF SERVICE

1 I HEREBY CERTIFY that I am an employee of the law firm of TANNER CHURCHILL
2 ANDERSON and that on the 25 day of October, 2021, I served the above and foregoing
3 **MOTION AND PROPOSED ORDER TO WITHDRAW AS COUNSEL OF RECORD** by
4 Electronic Service to the following:
5

6 William C. Reeves, Esq.
7 **MORALES FIERRO & REEVES**
8 600 S. Tonopah Drive, Suite 300
9 Las Vegas, NV 89106
10 *Attorneys for Plaintiff*

11 
12 An Employee with Tanner Churchill Anderson
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