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20 *Attorneys for Plaintiff*

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28 **UNITED STATES DISTRICT COURT**

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30 **DISTRICT OF NEVADA**

31 M.S., a minor individual, by Guardian
32 VALERIE SANDERS,

33 Case No.: 2:20-cv-01861-GMN-BNW

34 Plaintiff,

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38 **MOTION FOR LEAVE TO WITHDRAW
39 AS COUNSEL**

40 vs.

41 HYUNDAI MOTOR AMERICA, a
42 California business entity; HYUNDAI
43 MOTOR COMPANY, a Korean corporation;
44 TAKATA CORPORATION, a Japanese
45 corporation; ZF TRW AUTOMOTIVE
46 HOLDINGS CORP., a Delaware
47 Corporation; ZF FRIEDRICHSHAFEN AG,
48 a German Corporation; ROE AIRBAG
49 MANUFACTURING COMPANY; DOE
50 INDIVIDUALS I through XXX and ROE
51 CORPORATIONS XXXI through LX,

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53 Defendants.

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1 COMES NOW, the law firm of Kemp Jones, LLP, co-counsel for Plaintiffs, hereby moves
2 for leave to withdraw as counsel for Plaintiffs.

3 This Motion is based on the Affidavit of J. Randall Jones, the memorandum of points and
4 authorities, and any argument of counsel deemed necessary by this Court.

5 DATED this 11th day of February, 2021.

6
7 KEMP JONES, LLP

8 By: /s/ J. Randall Jones
9 J. RANDALL JONES, ESQ. (# 1927)
10 ERIC M. PEPPERMAN, ESQ. (#11679)
11 JOSHUA D. CARLSON, ESQ. (#11781)
12 3800 Howard Hughes Parkway
13 Seventeenth Floor
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15 *Co-Counsel for Plaintiff*

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17 **AFFIDAVIT OF J. RANDALL JONES**

18 STATE OF NEVADA)
19) ss.
20 COUNTY OF CLARK)

21 J. Randall Jones, being duly sworn, deposes and says:

22 1. I am a partner with the law firm Kemp Jones, LLP, and license to practice law in
23 the State of Nevada. I am personally familiar with this litigation and competent to testify
24 to the matters set forth herein.

25 2. My firm Kemp Jones, LLP, is one of the law firms representing Plaintiffs in the
26 instant action.

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1 3. I have discussed Kemp Jones, LLP's withdrawal with co-counsel James L.
2 Edwards and H. Stan Johnson, of the law firm COHEN-JOHNSON, LLC, and they have
3 agreed to continue on as Plaintiffs' counsel in the case without Kemp Jones, LLP.

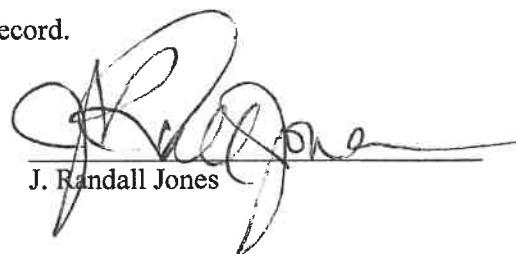
4 4. A copy of this motion will be served on Defendants, and all counsel of record in
5 this case.

6 5. As of the date of this filing, there are no hearings scheduled in the matter. A trial
7 date has not been set in the matter. Therefore, should the Court grant this motion, Kemp
8 Jones, LLP's withdrawal should not unreasonably delay any pretrial proceedings,
9 discovery, trial, hearing or other matter in this case.

10 6. The Plaintiffs may be served with notice of further proceedings at the following
11 address:

12 H. Stan Johnson, Esq.
13 COHEN-JOHNSON, LLC
14 375 E. Warm Springs Rd., Ste. 104
15 Las Vegas, Nevada 89119

16 7. Accordingly, Kemp Jones respectfully requests this Court to grant the instant
17 motion to withdraw as counsel of record.

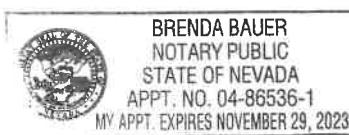


18 J. Randall Jones

19 SUBSCRIBED and SWORN to
20 Before me this 11th day of
21 February, 2021



22 _____
23 NOTARY PUBLIC



MEMORANDUM OF POINTS AND AUTHORITIES

As indicated in the Affidavit of J. Randall Jones attached hereto and incorporated herein by this reference, two law firms are presently counsel of record in this action, Kemp Jones, LLP and COHEN-JOHNSON, LLC. Because COHEN-JOHNSON, LLC will continue on as counsel in this case, withdrawal of Kemp Jones, LLP should cause no disruption or delay in the continued prosecution of this action.

LR IA 11-6 provides in pertinent part:

(b) If an attorney seeks to withdraw after appearing in a case, the attorney must file a motion or stipulation and serve it on the affected client and opposing counsel.

• • •

(e) Except for good cause shown, no withdrawal or substitution will be approved if it will result in delay of discovery, the trial, or any hearing in the case. Where delay would result, the papers seeking leave of the court for the withdrawal or substitution must request specific relief from the scheduled discovery, trial, or hearing. If a trial setting has been made, an additional copy of the moving papers must be provided to the clerk for immediate delivery to the assigned district judge, bankruptcy judge, or magistrate judge.

As indicated above, withdrawal of Kemp Jones, LLP would be in compliance with the Local Rules of this District as it would result in no delay of discovery, the trial, or any hearing in this case.

Based on the foregoing and the Affidavit of J. Randall Jones, Kemp Jones, LLP respectfully requests this Court approve the withdrawal of Kemp Jones, LLP from this action.

DATED this 11th day of February, 2021.

KEMP JONES, LLP

ORDER

IT IS SO ORDERED

DATED: 12:51 pm, February 16, 2021

Grubswinkel

BRENDA WEKSLER

BRENDA WERSEEK
UNITED STATES MAGISTRATE JUDGE

/s/ J. Randall Jones

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