

1 Edmund J. Gorman, Jr.  
2 Attorney at Law, Ltd.  
3 State Bar No. 11581  
4 335 W. First St.  
5 Reno, NV 89503  
6 (775) 622-3274  
7 [ejgormanjr@ejgormanlaw.com](mailto:ejgormanjr@ejgormanlaw.com)  
8 Attorney for Defendant Tom Vredevoogd, Trustee  
9 Of the Kimberly J. Vredevoogd Trust

7 **IN THE UNITED STATE DISTRICT COURT**  
8 **FOR THE DISTRICT OF NEVADA**

10 CHINA ENERGY CORPORATION, a Nevada ) 3:13-CV-00562-MMD-VPC  
11 corporation, )

12 Plaintiff, )

13 v. )

14 ALAN T. HILL, ELENA SAMMONS, )  
15 MICHAEL SAMMONS, THOMAS S. )  
16 VREDEVOORG, TRUSTEE OF THE )  
17 KIMBERLY J. VREDEVOOGD TRUST UA )  
18 10/7/2008, JUN HE, and RANDY DOCK )  
19 FLOYD, )

**MOTION TO SUBSTITUTE COUNSEL**

20 Defendants. )

21 COMES NOW Defendant Thomas S. Vredevoogd, Trustee of the Kimberly J. Vredevoogd Trust U/A/  
22 10/7/2008, by and through counsel, Edmund J. Gorman Jr., of Edmund J. Gorman Jr., Attorney at Law,  
23 Ltd, and moves the Court substitute Edmund J. Gorman Jr., Attorney at Law Ltd. for Holland & Hart,  
24 LLP as counsel of record for the Defendant in this case. Pursuant to LR 10-6(c), Defendant shows the  
25 following:

26 1. I, Thomas S. Vredevoogd, Trustee of the Kimberly J. Vredevoogd Trust, consent to the  
27 substitution of Edmund J. Gorman Jr., Attorney at Law, Ltd., as my counsel and attorney of record in  
28 place of Holland & Hart LLP, and Tamara Reid, Esq.

EDMUND J. GORMAN JR. • ATTORNEY AT LAW, LTD.  
335 W. FIRST ST. • RENO, NV 89503 • (775) 622-3274

  
Thomas S. Vredevoogd

2  
3  
4 2. I, Tamara Reid, consent to the substitution of Edmund J. Gorman Jr., Attorney at Law, Ltd., as  
5 counsel and attorney of record for Thomas S. Vredevoogd, Trustee of the Kimberly J. Vredevoogd Trust.

6  
7   
8 Tamara Reid

9  
10  
11 3. I, Edmund J. Gorman Jr., consent to the substitution of Edmund J. Gorman Jr., Attorney at  
12 Law, Ltd., as counsel and attorney of record for Thomas S. Vredevoogd, Trustee of the Kimberly J.  
13 Vredevoogd Trust, in place of Holland & Hart LLP.

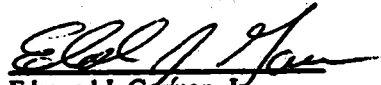
14  
15   
16 Edmund J. Gorman, Jr.

17  
18 WHEREFORE, Defendant prays the Court enter an Order:

19 1. Granting leave to substitute Edmund J. Gorman Jr., Attorney at Law, Ltd., in place of Holland  
20 & Hart, LLP as attorney of record for Thomas S. Vredevoogd, Trustee of the Kimberly J. Vredevoogd  
21 Trust, u/a/d 10/7/2008; and

22 2. For such other or additional relief as the Court deems just and proper.

23  
24 Dated this 28<sup>th</sup> Day of March, 2016

25   
26 Edmund J. Gorman, Jr.  
27 Attorney at Law, Ltd.  
28 335 W. First St.  
Reno, NV 89503

EDMUND J. GORMAN, JR. - ATTORNEY AT LAW, LTD.  
335 W. FIRST ST. - RENO, NV 89503 - (775) 622-3274

**Proof of Service**

1  
2 Thomas S. Vredevoogd, by and through counsel, Edmund J. Gorman Jr., Attorney at Law, Ltd., has  
3 served to the interested persons listed below a true copy of the Motion to Substitute Counsel, by service  
4 through CM/ECF to:

5 Richard L. Elmore, Esq.  
6 Tamara Reid, Esq.  
7 Holland & Hart  
8 5441 Kietzke Lane, 2nd Floor  
9 Reno, NV 89511

Michael Sammons  
15706 Seekers St  
San Antonio, TX 78255  
*Defendant in Proper Person*

9 Edmund J. Gorman Jr.  
10 335 W. First St.  
11 Reno, NV 89503  
12 *For Alan T. Hill*

13 And via US Mail, postage prepaid, and placed for mailing March 28<sup>th</sup>, 2016 to the following:

14 Elena Sammons  
15 15706 Seekers St  
16 San Antonio, TX 78255  
17 *Defendant in Proper Person*

Randy Dock Floyd  
4000 Goff Road  
Aynor, SC 29551  
*Defendant in Proper Person*

18 Jun He  
19 231 Split Rock Rd  
20 The Woodlands, TX 77381  
21 *Defendant in Proper Person*

22 China Energy Corporation  
23 c/o United Corporation Services, Inc.  
24 2520 ST ROSE PKWY STE 319  
25 Henderson, NV 89074

26 I declare under penalty of perjury under the laws of the State of Nevada and the United States of America  
27 that the foregoing is true and correct.

28 Dated this 28<sup>th</sup> Day of March, 2016.

/s/ Edmund J. Gorman, Jr.  
Edmund J. Gorman, Jr.  
Attorney at Law, Ltd.  
335 W. First St.  
Reno, NV 89503

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21 FLOYD, )  
22 Defendants. )

3:13-CV-00562-MMD-VPC

**ORDER GRANTING SUBSTITUTION OF COUNSEL**

23 IT IS HEREBY ORDERED that Edmund J. Gorman Jr., of Edmund J. Gorman Jr., Attorney at Law, Ltd.,  
24 is substituted in place and stead of Holland & Hart, LLP as attorney of record for Thomas S.  
25 Vredevoogd, Trustee of the Kimberly J. Vredevoogd Trust U/A/ 10/7/2008;

26 IT IS FURTHER ORDERED that Holland & Hart LLP, Tamara Reid, Esq., and Richard L. Elmore, Esq.  
27 shall be removed from the Court's electronic service matrix in this case.

28 Dated this 1st Day of April, 2016.

United States Magistrate Judge

Edmund J. Gorman, Jr., Attorney at Law, Ltd.  
335 W. First St. - Reno, NV 89503 - (775) 622-3274