

Exhibit “2”

Exhibit “2”

IN THE SUPREME COURT OF THE STATE OF NEVADA

MEI-GSR HOLDINGS, LLC, a Nevada limited liability company, d/b/a GRAND SIERRA RESORT,

District Court Case no. CV13-01704

Appellant,

vs.

PEPPERMILL CASINOS, INC., a Nevada corporation, d/b/a/ PEPPERMILL CASINO; and Ryan Tors, an individual,

Defendants.

CONSENT FOR WITHDRAWAL OF COUNSEL

Ryan Tors, previously a Defendant in the underlying action (CV13-01704), was dismissed from the District Court action on March 9, 2015. Appellant, Grand Sierra Resort, has filed an appeal in which I am named as a Respondent. It is my informed and voluntary decision to consent to the withdrawal of Mark Gunderson and the Gunderson Law Firm as my attorney in this appeal and in all further proceedings in the Nevada Supreme Court or Second Judicial District Court. I will represent myself pro per in these proceedings and service of process can be accomplished by serving me at the following address:

Ryan Tors
3095 Idlewild Drive
Reno, NV 89509
Email: rtors@yahoo.com
Telephone: 775-530-4799

DATED this 1 day of June, 2016.



RYAN TORS

Exhibit “1”

Exhibit “1”

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6 IN THE SECOND JUDICIAL DISTRICT COURT OF THE STATE OF NEVADA

7 IN AND FOR THE COUNTY OF WASHOE

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9 MEI-GSR HOLDINGS, LLC, a Nevada Case No. CV13-01704
Corporation, d/b/a GRAND SIERRA RESORT,

Dept. No. B7

10 Plaintiff,

11 vs.

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13 PEPPERMILL CASINOS, INC., a Nevada
Corporation, d/b/a PEPPERMILL CASINO;
14 RYAN TORS, an individual; JOHN DOES I-X
and JANE DOES I-X, and ABC
15 CORPORATIONS I-X,

16 Defendant.
17 _____ /

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19 **(PROPOSED) ORDER**

20 On August 2, 2013, Plaintiff MEI-GSR Holdings, LLC ("GSR") filed a Complaint against,
21 among others, Ryan Tors ("Tors"). Mark H. Gunderson, Esq. and John R. Funk, Esq. ("Former
22 Counsel") filed a Notice of Appearance to serve as Tors's counsel on April 29, 2014.

23 This Court entered the *Stipulated Confidentiality Agreement and Protective Order*
24 ("*Order*") on July 17, 2014. The *Order* provides that all Confidential Material must be destroyed or
25 returned to the producing party within thirty (30) days of the "Conclusion of this Action."

26 The Court dismissed Ryan Tors ("Tors") from this matter on March 9, 2015. Former
27 Counsel no longer represents Tors. Due to Former Counsel's prior representation of Tors, they are
28 in possession of documents that have been identified as Confidential and Highly

1 Confidential/Attorneys' Eyes Only as set forth in this Court's *Order*.

2 Former Counsel desired to comply with the *Order* and either return or destroy all
3 Confidential Material in their possession as set forth in the *Order*. Tors objected to Former Counsel
4 destroying any confidential documents as set forth in the *Order*. Out of an abundance of caution
5 and to comply with the Court's *Order*, Former Counsel filed their *Petition for Instructions* on June
6 19, 2015 ("*Petition*"). The *Petition* sought guidance and instructions from the Court concerning
7 Former Counsel's obligations relating to Confidential and Highly Confidential/Attorneys' Eyes
8 Only documents in light of the *Order*.

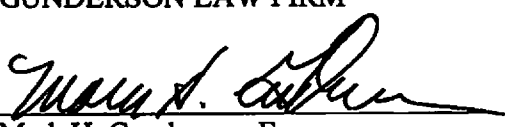
9 Former Counsel's *Petition* was unopposed. There is no need for Former Counsel to retain
10 any confidential information because the litigation is concluded as to Tors and Former Counsel.

11 IT IS ORDERED that Former Counsel should comply with Paragraph 20 of the *Order* and
12 destroy or return all confidential documents in Former Counsel's possession, custody, or control.

13 DATED this 23 day of July, 2015.

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15 
16 PATRICK FLANAGAN
17 District Judge

18 Submitted by:
19 GUNDERSON LAW FIRM

20 
21 Mark H. Gunderson, Esq.
22 Nevada State Bar No. 2134
23 John R. Funk, Esq.
24 Nevada State Bar No. 12372
25
26
27
28

1 **IN THE SUPREME COURT OF THE STATE OF NEVADA**

2 MEI-GSR HOLDINGS, LLC, a Nevada
3 limited liability company, d/b/a GRAND
4 SIERRA RESORT,

5 Appellant,

6 vs.

7 PEPPERMILL CASINOS, INC., a Nevada
8 corporation, d/b/a/ PEPPERMILL
9 CASINO;
10 and Ryan Tors, an individual,

11 Defendants.

Supreme Court No. 70319

**District Court Case no. CV13-
01704**

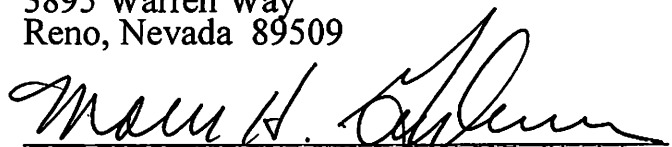
 Electronically Filed
 Jun 13 2016 10:41 a.m.
 Tracie K. Lindeman
 Clerk of Supreme Court

12 **MOTION TO CONFIRM WITHDRAWAL OF COUNSEL AND**
13 **TO BE REMOVED FROM CERTIFICATE OF SERVICE**

14 Mark H. Gunderson, Esq. and John R. Funk, Esq. at the Gunderson Law Firm
15 move this Honorable Court for an order confirming their withdraw as counsel in this
16 matter for Respondent Ryan Tors and to remove them from the certificate of service.
17 This motion is based upon the attached points and authorities and attached Consent for
18 Withdrawal of Counsel.

19 DATED this 10 day of June, 2016.

20 GUNDERSON LAW FIRM
21 3895 Warren Way
22 Reno, Nevada 89509

23 
24 MARK H. GUNDERSON - NSB #2134

25 **POINTS AND AUTHORITIES IN SUPPORT OF**
26 **MOTION TO BE RELIEVED AS COUNSEL**

27 Mark H. Gunderson, Esq. and John R. Funk, Esq. at the Gunderson Law Firm
28 ("Former Counsel") represented the Respondent Ryan Tors in the District Court
 proceedings. On March 9, 2015, the District Court dismissed Ryan Tors from the District
 Court proceedings without prejudice. Following dismissal, Former Counsel ceased
 representing Ryan Tors. The District Court confirmed and approved that Ryan Tors was

1 no longer represented by Former Counsel. See Order dated July 23, 2015 attached as
2 **Exhibit "1"** at pg. 1, ln 26-27. Except for the unopposed Petition for Instructions filed
3 on June 19, 2015, Mark H. Gunderson, Esq. and John R. Funk, Esq. had no involvement
4 in the later stages of the District Court proceedings and were not involved in the trial.

5 Ryan Tors does not wish to have either Former Counsel represent him in these
6 proceedings. Rather, Mr. Tors wishes to represent himself pro per in the proceedings
7 before this Court. Accordingly, Mr. Tors executed the Consent for Withdrawal of
8 Counsel attached as **Exhibit "2."**

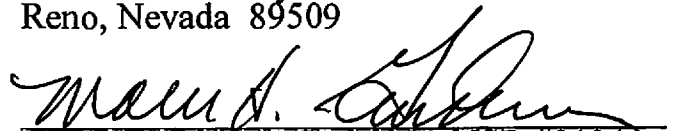
9 In accordance with Nevada Rule of Appellate Procedure 46, Former Counsel
10 respectfully request that this Honorable Court enter its order confirming that Mark H.
11 Gunderson and John R. Funk, Esq. at the Gunderson Law Firm have withdrawn from
12 representing Ryan Tors and shall be removed from the certificate of service.

13 **AFFIRMATION PURSUANT TO NRS 239B.030**

14 The undersigned does hereby affirm that the preceding document does not contain
15 the social security number of any person.

16 DATED this 10 day of June, 2016.

17 GUNDERSON LAW FIRM
18 3895 Warren Way
19 Reno, Nevada 89509

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21 MARK H. GUNDERSON - NSB #2134
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Kent R. Robison, Esq. Robison, Belaustegui, Sharp & Low 71 Washington Street Reno, NV 89503 krobison@rbsllaw.com <i>Attorneys for Respondents Peppermill and Ryan Tors</i>	H. Stan Johnson, Esq. Terry Kinnally, Esq. Cohen-Johnson, LLC 255 E. Warm Springs Road, Suite 100 Las Vegas, NV 89119 sjohnson@cohenjohnson.com <i>Attorneys for MEI-GSR Holdings, LLC</i>
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Ryan Tors 3095 Idlewild Drive Reno, NV 89509	Lansford W. Levitt 4747 Caughlin Parkway #6 Reno, NV 89519
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DATED this 3 day of June, 2016.

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EXHIBIT LIST

Exhibit #	Description	Pages
Exhibit "1"	Order dated July 23, 2015	2
Exhibit "2"	Consent for Withdrawal of Counsel	1