

BRIAN K. HARRIS, ESQ., of the law firm of **HARRIS & HARRIS INJURY LAWYERS**, and as Sponsoring Counsel for Pro Hac Vice Counsel, **BENEDICT P. MORELLI, ESQ.**, of **MORELLI LAW FIRM PLLC** and pursuant to Nevada Supreme Court Rule 46 and EDCR, , moves to withdraw as counsel of record for Appellants **GAVIN COX** and **MINH-HAHN COX** in this matter.

The Motion is made based upon the Points and Authorities and the Affidavit of counsel attached hereto.

DATED this 28 day of April, 2022.

HARRIS & HARRIS INJURY LAWYERS

By: _____

BRIAN K. HARRIS, ESQ.

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Attorneys for Appellants

**AFFIDAVIT OF BRIAN K. HARRIS, ESQ. IN SUPPORT OF
MOTION TO WITHDRAW AS COUNSEL
FOR APPELLANTS GAVIN COX AND MINH-HAHN COX**

STATE OF NEVADA)
) ss.
COUNTY OF CLARK)

BRIAN K. HARRIS, ESQ., being first duly sworn, deposes and says:

1. I am an attorney duly licensed to practice law in the State of Nevada and counsel for Appellants **GAVIN COX** and **MINH-HAHN COX**. I am also the Pro Hac Vice sponsoring counsel for **BENEDICT P. MORELLI, ESQ.**, of **MORELLI LAW FIRM PLLC**. This Affidavit is submitted in support of the **MOTION TO WITHDRAW AS COUNSEL FOR Appellants GAVIN COX & MINH-HAHN COX**.

2. Affiant undertook to represent Appellants in the above-referenced matter.

3. That due to the irreconcilable differences which have arisen with regard to the handling of this case, this firm is no longer able to represent Appellants.

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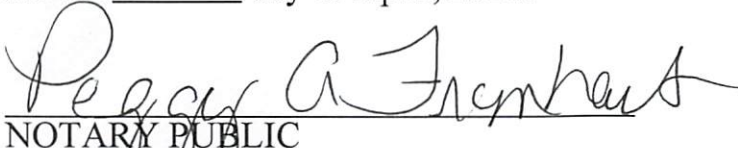
4. Appellants GAVIN COX and MINH-HAHN COX's mailing address is: 198 WARREN HOUSE, APT. 198, BECKFORD CLOSE/ WARWICK ROAD, KENSINGTON, LONDON, W14 8TR, UNITED KINGDOM. TELEPHONE: 07306 616995. EMAIL ADDRESS: MINH.LEWISCOX@PROTONMAIL.COM

FURTHER YOUR AFFIANT SAYETH NAUGHT.

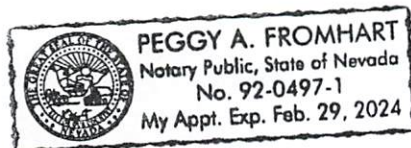


BRIAN K. HARRIS, ESQ.

SUBSCRIBED and SWORN to before
me this 28 day of April, 2022.



NOTARY PUBLIC



MEMORANDUM OF POINTS AND AUTHORITIES

Supreme Court Rule 46 provides in pertinent part:

The attorney in an action or special proceeding may be changed at any time before judgment or final determination as follows:

1. Upon consent of the attorney, approved by the client
2. Upon the order of the court or judge thereof on the application of the attorney or the client.

Further, EDCR 7.40 provides:

- (b) Counsel in any case may be changed only:
 - (2) When no attorney has been retained to replace the attorney withdrawing, by order of the court, granted upon written motion, and
 - (I) If the application is made by the attorney, the attorney must include in an affidavit the address, or last known address, at which the client may be served with notice of further proceedings taken in the case in the event the application for withdrawal is granted, and the telephone number, or last known telephone number, at which the client may be reached and the attorney must serve a copy of the application upon the client and all other parties to the action or their attorneys...

Appellants and their attorneys have differing opinions as to how this matter should proceed. It is felt to be in Appellants' best interest that they obtain new counsel.

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CONCLUSION

Based on the foregoing, Appellants' counsel respectfully requests the Court grant the Motion to Withdraw as Counsel for Appellants **GAVIN COX** and **MINH-HAHN COX**.

DATED this 28 day of April, 2022.

HARRIS & HARRIS INJURY LAWYERS

By: _____

BRIAN K. HARRIS, ESQ.

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Attorneys for Appellants

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 28 day of April, 2022, I served a true and correct copy of the foregoing **MOTION TO WITHDRAW AS ATTORNEYS FOR APPELLANTS**, addressed to the following counsel of record at the following address(es):

____ **VIA U.S. MAIL:** by placing a true copy thereof enclosed in a sealed envelope with postage thereon fully prepaid, addressed as indicated on service list below in the United States mail at Las Vegas, Nevada.

____ **VIA FACSIMILE:** by causing a true copy thereof to be telecopied to the number indicated on the service list below.

✓ ____ **VIA EMAIL:** by causing a true copy thereof to be emailed to the email addresses indicated on the service list below, with delivery confirmation and read confirmation.

✓ ____ **VIA ELECTRONIC: FILE ONLY / FILE AND SERVE / SERVICE ONLY** by causing a true copy thereof to be electronically submitted through Nevada Supreme Court efilng program.

____ **VIA PERSONAL DELIVERY:** by causing a true copy hereof to be hand delivered on this date to the addressee(s) at the address(es) set forth on the service list below.

GAVIN COX & MINH-HAHN COX

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United Kingdom W14 8TR
Telephone: 07306 616995

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Pro Hac Vice Counsel for Appellants


HARRIS & HARRIS Employee