

IN THE SUPREME COURT OF THE STATE OF NEVADA

LISA GUZMAN,

Appellants,

vs.

ROBERT L. JOHNSON; MIGUEL
PENELLA; JOHN HSU; ARLENE
MANOS; H. VAN SINCLAIR;
ANDOR M. LASZLO; SCOTT
ROYSTER; DAYTON JUDD; JOHN
ZIEGELMAN; AMC NETWORKS
INC.; DIGITAL ENTERTAINMENT
HOLDINGS, LLC; AND RIVER
MERGER SUB, INC.,

Respondents.

SUPREME COURT CASE NO.
79818

Electronically Filed

CASE NO.: Sep 24 2020 11:40 a.m.

DEPT NO.: Elizabeth A. Brown

Clerk of Supreme Court

**MOTION TO WITHDRAW
CHARLES E. MOULINS, ESQ.
AS COUNSEL OF RECORD FOR
RESPONDENTS**

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Kirk B. Lenhard, Esq. and Maximilien D. Fetaz, Esq., of the law firm Brownstein Hyatt Farber Schreck, LLP, and John L. Hardiman, Esq. and Charles E. Moulins, Esq., of the law firm Sullivan & Cromwell LLP, hereby move this Court, pursuant to NRAP 46(e)(3), SCR 46, and NRPC 1.16, to withdraw Charles E. Moulins, Esq. as counsel of record for Respondents Robert L. Johnson; Miguel Penella; John Hsu; Arlene Manos; H. Van Sinclair; Andor M. Laszlo; Scott Royster; Dayton Judd; John Ziegelman; AMC Networks Inc.; Digital Entertainment Holdings, LLC; and River Merger Sub, Inc. (“Respondents”). Kirk B. Lenhard, Esq., Maximilien D. Fetaz, Esq., and John L. Hardiman, Esq. will remain as counsel of record for Respondents.

NRAP 46(e)(3) provides that “[a] withdrawal of counsel may be effected only by filing a motion in the court. The withdrawing attorney shall serve a copy of the motion on the attorney’s client and any adverse party. The motion shall clearly state the reasons for the attorney’s withdrawal consistent with SCR 46 and RPC 1.16.” SCR 46(2) further provides that “[t]he attorney in an action or special proceeding may be changed at any time before judgment or final determination as follows: Upon the order of the court or judge thereof on the application of the attorney or the client.” Finally, NRPC 1.16(b) states that an attorney may be allowed to withdraw from representing a client if: “(7) [o]ther good cause for withdrawal exists.”

Here, final judgment in this matter has not yet been entered. Additionally, good cause exists to permit Mr. Moulins to withdraw as counsel of record for Respondents because he is leaving the law firm of Sullivan & Cromwell to continue his practice at another firm. Respondents will remain clients of Sullivan & Cromwell LLP and Brownstein Hyatt Farber Schreck, LLP (collectively, the “Law Firms”) in this matter, and the Law Firms will continue to represent the Respondents in this matter.

Accordingly, pursuant to NRAP 46(e)(3), SCR 46, and NRPC 1.16, this Court should grant this motion to withdraw and remove Mr. Moulins as counsel of record for Respondents in this appellate matter.

Dated this 24th day of September, 2020.

BROWNSTEIN HYATT FARBER
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that the foregoing **MOTION TO WITHDRAW CHARLES E. MOULINS, ESQ. AS COUNSEL OF RECORD FOR RESPONDENTS** was filed electronically with the Nevada Supreme Court on the 24th day of September, 2020. Electronic service of the foregoing document shall be made in accordance with the Master Service List as follows:

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