

IN THE SUPREME COURT OF THE STATE OF NEVADA

Ali Shahrokhi,

Petitioner,

vs.

Kizzy Burrow,

Respondent.

Electronically Filed
Mar 09 2021 11:54 a.m.
Sup. Ct. Docket No. 81978 cv 82245
Elizabeth A. Brown
Clerk of Supreme Court
Dist. Ct. Case No. D-18-581208-P

**MOTION TO WITHDRAW AS COUNSEL OF RECORD FOR
RESPONDENT**

COMES NOW, THOMAS J. STANDISH, ESQ. and PHILIP SPRADLING, ESQ., of the STANDISH LAW GROUP, and hereby move for an Order to Withdraw as Counsel of Record for Respondent, Kizzy Burrow.

This Motion is based upon the attached Points and Authorities, the Affidavit of Philip Spradling, Esq., the Declaration of Yvonne Ruiz, Esq., and the Declaration of Respondent Kizzy Burrow.

DATED this 9th day of March, 2021.



THOMAS J. STANDISH, ESQ.

Nevada Bar No. 1424

PHILIP SPRADLING, ESQ.

Nevada Bar No. 13590

1635 Village Center Circle, Suite 180
Las Vegas, Nevada 89134

POINTS AND AUTHORITIES

NRAP 46(e)(3) states 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. A motion that is filed after judgment or final determination as provided in SCR 46 will only be granted if the Supreme Court or Court of Appeals has issued a final decision in the matter and the time for filing a petition for rehearing has expired.

Respondent, Kizzy Burrow elected to change counsel on or about September 29, 2020. On February 18, 2021, Respondent's new counsel, Yvonne Ruiz, Esq. of Marzola & Ruiz Law Group PLLC, filed a Notice of Appearance instead of a substitution of counsel. Respondent's intention, however, was to replace her counsel.


The Standish Law Group, in accordance with the wishes of Respondent, and with the consent of the Marzola & Ruiz Law Group PLLC, seeks to withdraw as co-counsel for Respondent, leaving Yvonne Ruiz, Esq. of Marzola & Ruiz Law Group PLLC in place as Respondent's counsel. The reason for the withdrawal is that Respondent, Kizzy Burrow, no longer wishes the Standish Law Group to represent her in this matter.

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Pursuant to NRPC 1.16, the withdrawal can be accomplished without material adverse effect on the Respondent's interests, as Marzola & Ruiz Law Group PLLC continues to represent her in this case.

DATED this 9th day of March, 2021.


THOMAS J. STANDISH, ESQ.
Nevada Bar No. 1424
PHILIP SPRADLING, ESQ.
Nevada Bar No. 13590
1635 Village Center Circle, Suite 180
Las Vegas, Nevada 89134

AFFIDAVIT OF PHILIP SPRADLING, ESQ.

STATE OF NEVADA }
COUNTY OF CLARK } ss.

PHILIP SPRADLING, being duly sworn, deposes and says;

That Affiant is an attorney duly licensed to practice law in the State of Nevada and an employee of the Standish Law Group. I have personal knowledge of the matters contained herein and am competent to testify thereto.

Respondent, Kizzy Burrow informed the Standish Law Group of her decision to change counsel on or about September 29, 2020.

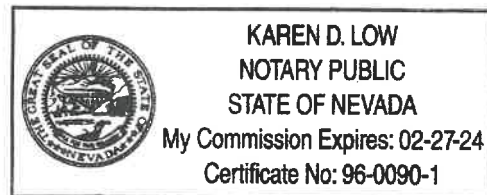
As Respondent continues to be represented by Marzola & Ruiz Law Group PLLC, I do not believe the withdrawal of the Standish Law Group will have a material adverse effect upon Respondent's interests.

Further your affiant sayeth naught.


PHILIP SPRADLING, ESQ.

SUBSCRIBED to and SWORN before me
this 9th day of March, 2021.


NOTARY PUBLIC in and for said
County and State



DECLARATION OF YVONNE RUIZ, ESQ.

Pursuant to NRS 53.045, Yvonne Ruiz, Esq., makes the following unsworn declaration.

I am an attorney duly licensed to practice law in the State of Nevada and an employee of the Marzola and Ruiz Law Group PLLC. I have personal knowledge of the matters contained herein and am competent to testify thereto.

On or about September 29, 2020, Respondent, Kizzy Burrow hired Marzola and Ruiz Law Group PLLC to represent her in place of the Standish Law Group.

As Respondent continues to be represented by Marzola & Ruiz Law Group PLLC, I do not believe the withdrawal of the Standish Law Group will have a material adverse effect upon Respondent's interests.

Marzola & Ruiz Law Group consents to the withdrawal of the Standish Law Group in this matter.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 9th day of March, 2021.



YVONNE RUIZ, ESQ.

DECLARATION OF KIZZY BURROW

Pursuant to NRS 53.045, Kizzy Burrow makes the following unsworn declaration.

I am the Respondent in this case. I have personal knowledge of the matters contained herein and am competent to testify thereto.

On or about September 29, 2020, I hired Marzola and Ruiz Law Group PLLC to represent me in place of the Standish Law Group.

As I continue to be represented by Marzola & Ruiz Law Group PLLC, I do not believe the withdrawal of the Standish Law Group will have a material adverse effect upon my interests.

I consent to the withdrawal of the Standish Law Group in this matter.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 8th day of March, 2021.


KIZZY BURROW

CERTIFICATE OF SERVICE

I hereby certify that the foregoing MOTION TO WITHDRAW AS COUNSEL OF RECORD FOR RESPONDENT was served, on this date, as follows:

By mailing it by first class mail with sufficient postage prepaid to the following address:

Ali Shahrokhi
10695 Dean Martin Dr. #1214
Las Vegas, Nev. 89141

Kizzy Burrow
[address confidential]

Yvonne Ruiz, Esq.
Marzola & Ruiz Law Group PLLC
170 S. Green Valley Pkwy, Suite 300
Henderson, Nevada 89012

By electronic service via the Court's electronic filing and service system (eFlex):


An employee of Standish Law Group