

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

MARILEE BROWN; MARILOU  
BROWN; AND GREGORY J.  
BROWN;

Appellants,

vs.

ST. MARY'S REGIONAL MEDICAL  
CENTER; TAMMY EVANS  
(ERRONEOUSLY NAMED AS TAMI  
EVANS); PREM REDDY, M.D.;  
TANZEEL ISLAM, M.D.; SRIDEVI  
CHALLAPALLI, M.D.; AND MARK  
MCCALLISTER, M.D.,

Respondents.

Electronically Filed  
May 10 2022 03:12 p.m.  
Elizabeth A. Brown  
Clerk of Supreme Court

Case No.: 81434 - COA

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**MOTION TO WITHDRAW AS COUNSEL**

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TO: The Clerk of the Court and all parties of record

Pursuant to NRAP 46(e)(3), Kemp Jones, LLP, counsel of record for  
Appellants in entitled matter, hereby moves to withdraw as counsel for Appellants.

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This Motion is made and based on the points and authorities cited herein.

DATED this 10th day of May, 2022.

**KEMP JONES, LLP**

/s/ Don Springmeyer  
Don Springmeyer, Esq. (#1021)  
Jackson Wong, Esq. (#15674)  
3800 Howard Hughes Pkwy, 17<sup>th</sup> Floor  
Las Vegas, Nevada 89169  
*Attorneys for Appellants*

## **MEMORANDUM OF POINTS AND AUTHORITIES**

Kemp Jones, LLP has good cause to withdraw as counsel under Rule 46 of the Supreme Court Rules, which provides, in pertinent part, that “after judgment or final determination, an attorney may withdraw as attorney of record at any time upon the attorney’s filing a withdrawal, with or without the client’s consent.” *See* SCR 46.

Here, a judgment and final determination was made by this court on April 20, 2022, affirming the district court’s judgment. *See* April 22, 2022’s Order of Affirmance. Accordingly, Kemp Jones, LLP may and hereby does request to withdraw as attorney of record.

Kemp Jones, LLP has further good cause to withdraw as counsel under subsection (b) of NRPC 1.16, which states, in pertinent part:

(b) ... a lawyer may withdraw from representing a client if:

(1) Withdrawal can be accomplished without material adverse effect on the interests of the client;

...”

*See* NRPC 1.16(b)(1).

Here, a withdrawal by Kemp Jones, LLP will not have a material adverse effect on the interests of Appellants, because the matter has concluded and a judgment/final determination has been reached by this court after full briefing and oral arguments by the parties.

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## **CONCLUSION**

Thus, based on the foregoing, Kemp Jones, LLP respectfully requests that this Court enter an order approving its withdrawal as attorneys for Appellants.

DATED this 10th day of May, 2022.

**KEMP JONES, LLP**

/s/ Don Springmeyer

Don Springmeyer, Esq. (#1021)

Jackson Wong, Esq. (#15674)

3800 Howard Hughes Pkwy, 17<sup>th</sup> Floor

Las Vegas, Nevada 89169

*Attorneys for Appellants*

## **CERTIFICATE OF SERVICE**

The undersigned does hereby certify that on May 10, 2022, a true and correct copy of the foregoing **MOTION TO WITHDRAW AS COUNSEL** was electronically filed with the Clerk of the Court for the Nevada Supreme Court by using the Nevada Supreme Court's E-Filing system (E-Flex). Participants in the case who are registered with E-Flex as users will be served by the E-Flex system.

Dated this 10th day of May, 2022.

By: /s/ Pamela McAfee  
An employee of Kemp Jones, LLP