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4 **THE VEGAS LAWYERS**
5 **BY PAUL PADDA LAW, PLLC**
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7 *Mailing Address:*
8 4030 S. Jones Boulevard, Unit 30370
9 Las Vegas, Nevada 89173
10 *Attorney for Defendant*

11 **DISTRICT COURT**
12 **CLARK COUNTY, NEVADA**

13 STATE OF NEVADA,

14 Plaintiff,

15 vs.

16 DRYDEN, BRYAN WARREN,

17 Defendant.

CASE NO.: C-18-334955-1

DEPT.: XVIII (18)

MOTION TO WITHDRAW AS
ATTORNEY OF RECORD FOR
DEFENDANT

[Hearing Requested]

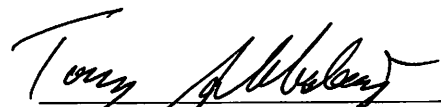
18 COMES NOW, Defendant, BRYAN WARREN DRYDEN, by through Tony L.
19 Abbatangelo, Esq. with the instant motion for an order withdrawing as attorney of record for
20 Defendant.

21 This Motion is made and based upon the following memorandum of Points and
22 Authorities, the Affidavit of Counsel, argument at the time of hearing and all pleadings and papers
23 on file herein.

24 DATED this 14th day of July, 2021.

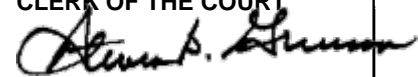
Respectfully Submitted By:

25 By:

26 

27 TONY L. ABBATANGELO, ESQ.
28 4560 South Decatur Boulevard, Suite 300
Las Vegas, Nevada 89103
Attorney for Defendant

Electronically Filed
7/14/2021 3:46 PM
Steven D. Grierson
CLERK OF THE COURT



Electronically Filed
Jul 28 2021 11:41 a.m.
Elizabeth A. Brown
Clerk of Supreme Court

POINTS & AUTHORITIES

I. Eighth Judicial District Court Rule 7.40 provides in pertinent part:

EDCR Rule 7.40 states, in pertinent part, as follows:

(2) When no attorney has been retained to replace the attorney withdrawing, by order of the court, granted upon written motion therefore, and

1. If the application is made by the attorney, he 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 he must serve a copy of the application upon the client and all other parties to the action or their attorneys...
3. No application for withdrawal...may be granted if a delay of the trial or of the Hearing of any other matter in the case would result.

Attached hereto is an Affidavit of Tony L. Abbatangelo, Esq., setting forth the reasons for withdrawal from Defendant's representation. Defendant has stated in numerous occasion on and off the record that he does not want Counsel representing him. Due to the facts set forth in that affidavit, counsel, Tony L. Abbatangelo, Esq., respectfully requests that he be allowed to withdraw as attorney of record for Defendant in the above matter.

CONCLUSION


Based upon the above and foregoing, Affiant and this law firm respectfully requests an Order Granting the Motion to Withdraw as Attorney of Record for Jehu Abisaid Diaz.

Respectfully Submitted,

DATED this 14th day of July, 2021.

Respectfully Submitted By:

By:


TONY L. ABBATANGELO, ESQ.
4560 South Decatur Boulevard, Suite 300
Las Vegas, Nevada 89103
Attorney for Defendant

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AFFIDAVIT OF TONY L. ABBATANGELO, ESQ.
IN SUPPORT OF MOTION TO WITHDRAW

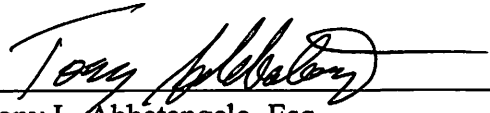
STATE OF NEVADA)
) ss:
COUNTY OF CLARK)

I, Tony L. Abbatangelo, Esq., being first duly sworn under oath, subject to the penalty for perjury pursuant to Nevada law, and in conformity with N.R.S. 53.045, hereby deposes and says:

1. I am the attorney of record for the Defendant, BRYAN WARREN DRYDEN, in the above-entitled matter and I am an attorney duly licensed to practice before all courts in the State of Nevada;
2. I make this Affidavit based upon facts within my own knowledge, save and except as to those matters alleged upon information and belief, and as to those matters, I believe them to be true;
3. At the commencement of my representation of the Defendant, BRYAN WARREN DRYDEN, was appointed to Counsel to represent before this honorable Court;
4. On several occasions both on and off the record Defendant, BRYAN WARREN DRYDEN, has indicated his dissatisfaction with the representation of Counsel and objected to his representation in open court;
5. The Defendant's last known address is as follows:

Bryan Dryden, ID# 1070536
High Desert State Prison
P.O. Box 650
Indian Springs, Nevada 89070-0650

- 1 6. That the lines of communication have been severed such that I can no longer adequately
2 represent Defendant, BRYAN WARREN DRYDEN, in this matter.
3 7. If called upon to testify regarding any of the above, your Affiant could do so confidently;
4

5
6 
7 Tony L. Abbatangelo, Esq.

8 Signed in conformity with N.R.S. 53.045 this
9 14th day of July, 2021 in Las Vegas, Nevada

CERTIFICATE OF SERVICE

I HEREBY certify that service of the above and foregoing **MOTION TO WITHDRAW**
AS ATTORNEY OF RECORD was made this 14th day of July, 2021 to:

Office of the District Attorney
200 Lewis Avenue, Third Floor
Las Vegas, Nevada 89101
Motions@clarkcountynyda.com

By: 

An Employee of Paul Padda Law, PLLC