

IN THE SUPREME COURT OF THE STATE OF NEVADA

KYMBERLIE HURD,

Appellant,

vs.

MARIO OPIPARI,

Respondent.

Docket Number: 85537

Related Case Number: 85215

Electronically Filed  
Jan 31 2023 08:37 AM  
Elizabeth A. Brown  
Clerk of Supreme Court

**MOTION TO WITHDRAWAL**

Chaka T. Crome, Esq., of Crome Law Firm, attorneys for Respondent, Mario Opipari, hereby moves this Court to enter an Order allowing withdrawal of Counsel.

This Motion is based on the foregoing Memorandum of Points and Authorities, the papers and pleadings on file, and any other issues this court may wish to consider.

Respectfully submitted this 30<sup>th</sup> day of January, 2023.

**CROME LAW FIRM**



CHAKA T. CROME, ESQ.

Nevada Bar No.: 8116

520 South Fourt Street

Las Vegas, Nevada 89101

*Attorney for Respondent*

## **MEMORANDUM OF POINTS AND AUTHORITIES**

### **I. STATEMENT OF FACTS**

The Respondent, Mario Opipari, and Crome Law Firm previously entered into a Legal Services Agreement for representation in his custody matter. The Legal Service Agreement did not include representation for appeals. Since this time, Respondent has obtained Ford & Friedman as new counsel such that continued representation by Crome Law Firm is no longer necessary. Additionally, the Respondent is aware that the undersigned has begun her transition into retirement, and, as such, she is no longer able to remain counsel to the Respondent in this instant matter. Respondent does not have any expectations of Crome Law Firm remaining on his case.

As a result of the foregoing, Crome Law Firm is filing this Motion to Withdraw as Attorney of Record.

### **II. LEGAL ANALYSIS**

#### **A. CROME LAW FIRM'S REQUEST TO WITHDRAW AS ATTORNEY OF RECORD SHOULD BE GRANTED.**

Pursuant to Supreme Court Rule ("SCR") 46, an attorney may withdraw from an action upon application and subsequent order of the Court unless there is a final judgment at which time an attorney may simply file a withdrawal without client consent.

When filing a Motion to Withdraw, counsel is permitted to file said Motion in a matter in which counsel represents a client. *Earl v. Las Vegas Auto Parts*, 73 Nev. 58, 307 P.2d 781 (1957).

Here, Respondent has voluntarily secured alternate counsel to represent him in the instant matter. Moreover, the undersigned is transitioning into retirement. Accordingly, the undersigned and Crome Law Firm can no longer represent the Respondent, nor is the undersigned's representation necessary as Respondent has secured other, competent counsel. Respondent may now be reached as follows:

Mario Oipari  
c/o: Matthew H. Friedman, Esq.  
Ford & Friedman  
2200 Paseo Verde Pkwy., Suite 350  
Henderson, Nevada 89052  
Telephone: (702) 476-2400

Accordingly, Crome Law Firm respectfully request that the Court allow the firm to withdraw as attorney of record for Respondent based on the above facts.

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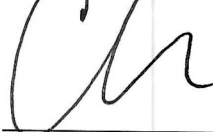
**III.  
CONCLUSION**

WHEREFORE, based upon the foregoing, counsel respectfully requests this Court enter Orders granting the following relief:

1. Allowing counsel for Respondent, CHAKA T. CROME, ESQ., counsel for Respondent, of Crome Law Firm, to withdraw as attorney of record; and
2. For any other relief this Court may deem just and appropriate.

Respectfully submitted this 30<sup>th</sup> day of January, 2023.

**CROME LAW FIRM**



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CHAKA T. CROME, ESQ.  
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