

1 Ross C. Goodman, Esq.
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5 Attorneys for Defendant Larry Jeffery

6 **UNITED STATES DISTRICT COURT**

7 **DISTRICT OF NEVADA**

8 SECURITIES AND EXCHANGE
9 COMMISSION,

Case No. 2:22-CV-00612-CDS-EJY

10 Plaintiff,

**MOTION TO WITHDRAW AS
COUNSEL FOR LARRY JEFFERY**

11 vs.

12 MATTHEW WADE BEASLEY, et al.

13 Defendants,
14

15 Pursuant to District of Nevada Local Rule LR IA 11-6(b) and Rule 1.16 of the Nevada
16 Rules of Professional Conduct, Ross C. Goodman, Esq., Goodman Law Group, P.C. moves this
17 Honorable Court for entry of an order granting leave to withdraw as attorney of record for
18 Defendant Larry Jeffery (“Mr. Jeffery”).
19

20 This Motion is based upon the Memorandum of Points and Authorities, the Declaration of
21 Ross C. Goodman (“Goodman Declaration”), attached hereto as Exhibit A, and any oral argument
22 that the Court may allow. The instant Motion is brought in good faith and not to hinder or delay
23 the judicial process.
24

25 **MEMORANDUM OF POINTS AND AUTHORITIES**

26 In April 2022, the undersigned counsel undertook representation of Mr. Jeffery. However,
27 Mr. Jeffery no longer has the financial resources to continue to pay for additional attorney’s fees.
28

1 The subject of withdrawal has been discussed for months with Mr. Jeffery. In light of his financial
2 condition, Mr. Jeffery consents to the undersigned counsel's withdrawal.

3 In the Receiver's Motion to Compel, the District of Nevada Local Rule IA 11-6 governs
4 attorney appearances, substitutions, and withdrawals and provides in pertinent part as follows:

5 LR IA 11-6. APPEARANCES, SUBSTITUTIONS, AND WITHDRAWALS

6 [. . .]

7 (b) If an attorney seeks to withdraw after appearing in a case, the
8 attorney must file a motion or stipulation and serve it on the affected
9 client and opposing counsel. The affected client may, but is not
10 required to, file a response to the attorney's motion within 14 days
11 of the filing of the motion, unless the court orders otherwise.

12 In addition, Rule 1.16 of the Nevada Rules of Professional Conduct ("NRPC") govern
13 termination of representation and provides in pertinent part as follows:

14 (b) Except as stated in paragraph (c), a lawyer may withdraw from
15 representing a client if:
16 (1) Withdrawal can be accomplished without material adverse effect
17 on the interests of the client; . . .
18 (7) Other good cause for withdrawal exists.

19 The discovery process is in the beginning stages and will not cause any disruption to the
20 proceedings. The legal standards under both LR IA 11-6 and Nevada Rules of Professional
21 Conduct 1.16 are met and withdrawal should be permitted.

22 The last known street address and telephone number for Mr. Jeffery is:

23 3034 NESTALL RD
24 LAGUNA BEACH CA 92651-2026
25 949-290-6865

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1 Based on the foregoing, Ross C. Goodman, Esq. respectfully requests that this Honorable
2 Court grant his Motion to Withdraw as Counsel of Record.

3 Dated this 7th day of April 2023.

4 **GOODMAN LAW GROUP, P.C.**

5
6 By: /s/ Ross C. Goodman, Esq.
7 Ross C. Goodman, Esq. (NBN 7722)
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13 *Attorneys for Larry Jeffery*

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IT IS SO ORDERED:

UNITED STATES DISTRICT JUDGE

DATED: _____

CERTIFICATE OF SERVICE

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The undersigned hereby certifies that on the 7th day of April 2023, a true and correct copy of the foregoing Motion to Withdraw as Counsel for Larry Jeffery was served by using the CM/ECF system and via email to Larry Jeffery larry@westonemortgage.com.

/s/ Tiffanie Johannes _____
Employee of Goodman Law Group, P.C.

Exhibit A

Exhibit A

1 Ross C. Goodman, Esq.
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Email: ross@rosscgoodman.com
5 *Attorneys for Defendant Larry Jeffery*

6 **UNITED STATES DISTRICT COURT**

7 **DISTRICT OF NEVADA**

8 SECURITIES AND EXCHANGE
9 COMMISSION,

10 Plaintiff,

11 vs.

12 MATTHEW WADE BEASLEY, et al.

13 Defendants,
14

Case No. 2:22-CV-00612-CDS-EJY

**DECLARATION OF ROSS
GOODMAN, ESQ. IN SUPPORT OF
MOTION TO WITHDRAW AS
COUNSEL FOR LARRY JEFFERY**

15 Pursuant to 28 U.S.C. § 1746, I, Ross Goodman, Esq., declares as follows:

16 1. I am an attorney licensed to practice law in the State of Nevada and the District of
17 Nevada. I have knowledge of the matters stated herein.

18 2. In April 2022, the undersigned counsel undertook representation of Mr. Jeffery.
19 However, Mr. Jeffery no longer has the financial resources to continue to pay for additional
20 attorney’s fees. This has been discussed for months with Mr. Jeffery who consents to the need for
21 undersigned counsel to withdraw.
22

23 3. The discovery process is in the beginning stages and will not cause any disruption to
24 the proceedings.

25 4. The last known street address and telephone number for Mr. Jeffery is:

26 3034 NESTALL RD
27 LAGUNA BEACH CA 92651-2026
28 949-290-6865

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5. This motion is made in good faith and not for dilatory motives.

6. There are currently no pending deadlines or hearings.

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

DATED this 7th day of April 2023

/s/ Ross C. Goodman, Esq.
Ross C. Goodman, Esq.