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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 7<sup>th</sup> day of April 2023.  
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5 **GOODMAN LAW GROUP, P.C.**

6 By: /s/ Ross C. Goodman, Esq.  
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14 **IT IS SO ORDERED:**

15   
16 Dayna J. Zouchak  
17 UNITED STATES MAGISTRATE JUDGE

18 DATED: April 7, 2023  
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