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13 **UNITED STATES DISTRICT COURT**
14 **DISTRICT OF NEVADA**
15

16 SECURITIES AND EXCHANGE
17 COMMISSION,
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19 Plaintiff,
20
21 vs.
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23 MATTHEW WADE BEASLEY et al.,
24
25 Defendants
26
27 THE JUDD IRREVOCABLE TRUST et
28 al.
Relief Defendants

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

EMERGENCY MOTION TO WITHDRAW
AS COUNSEL OF RECORD FOR PAULA
BEASLEY

1 Pursuant to District of Nevada Local Rule LR IA 11-6(b)
2 and Rule 1.16 of the Nevada Rules of Professional Conduct,
3 Aaron D. Grigsby, Esq., of the Grigsby Law Group move this
4 Honorable Court for entry of an order granting leave to
5 withdraw as attorney of record for non-party Paula Beasley
6 ("Ms. Beasley"). This Motion is based upon the Memorandum of
7 Points and Authorities, the Declaration of Aaron D. Grigsby,
8 attached hereto as Exhibit A, and any oral argument that the
9 Court may allow. The instant Motion is brought in good faith
10 and not to hinder or delay the judicial process.

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MEMORANDUM OF POINTS AND AUHORITIES

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2 In March 2022, the undersigned undertook representation
3 of Paula Beasley. On September 11, 2023, Paula Beasley
4 informed the undersigned that she no longer wanted to be
5 represented by the undersigned. Ms. Beasley has requested a
6 copy of her file be provided. It is unknown whether Ms.
7 Beasley has retained new counsel or if she wishes to prepare
8 and file any further pleadings necessary in this matter, which
9 is her right, and has therefore terminated the undersigned's
10 representation in this matter. Paula Beasley is not actively
11 engaging in any substantive communication with the
12 undersigned. In light of the foregoing, good cause exists to
13 permit the undersigned to withdraw as counsel of record.

14 District of Nevada Local Rule IA 11-6 governs attorney
15 appearances, substitutions and withdrawals and provides in
16 pertinent part as follows:

17 LR IA 11-6 APPEARANCES, SUBSTITUTIONS AND WITHDRAWALS

18 (b) If an attorney seeks to withdraw after appearing
19 in a case, the attorney must file a motion or
20 stipulation and serve it on the affected client and
21 opposing counsel. The affected client may, but is
22 not required to file a response to attorney's motion
within 14 days of the filing of the motion, unless
the court orders otherwise¹.

23 In addition, Rule 1.16 of the Nevada Rules of
24 Professional Conduct govern termination of representation and
provides in pertinent part:

25 (b) Except as stated in paragraph (c), a lawyer may
26 withdraw from representing a client if:

27
28 _____
¹ LR IA 11-6

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1 (1) Withdrawal can be accomplished without material
2 adverse effect on the interest of the client,...
3 (7) Other good cause for withdrawal exists
4 Here, the legal standards under both LR IA 11-6 and Nevada
5 Rules of Professional Conduct 1.6 are met and withdrawal
6 should be permitted.

6 LR IA 11-6(a) states:

7 Unless the court orders otherwise, a party who has
8 appeared by attorney cannot while so represented
9 appear or act in the case. This means that once an
10 attorney makes an appearance on behalf of a party,
11 that party may not personally file a document with
12 the court; all filings must thereafter be made by
13 the attorney. An attorney who has appeared for a
14 party must be recognized by the court and all the
15 parties as having control of the client's case,
16 however, the court may hear a party in open court
17 even though the party is represented by an
18 attorney².

14 As discussed above, Paula Beasley wishes to handle all
15 remaining filings in this matter. However, LR IA 11-6(a)
16 prohibits Ms. Beasley from doing so until the instant Motion
17 is granted. Given the upcoming September 29, 2023, deadline
18 for compliance with August 25, 2023, Recommendations from this
19 Court, it is necessary to seek emergency review of the instant
20 Motion in an effort to secure the undersigned's withdrawal and
21 facilitate Paula Beasley's ability to move forward with this
22 matter on a pro se basis. The last known address and
23 telephone number for Paula Beasley is:

24 5317 Schoofey Street,
25 Las Vegas, Nevada 89166
26 (702) 515-9660
27 paulabeasley5@gmail.com

28 _____
² LR IA 11-6(a)

1 Based on the foregoing, Aaron D. Grigsby, Esq., of the
2 Grigsby Law Group respectfully requests that this Honorable
3 Court grant its Motion to Withdraw as Counsel of Record for
4 non-party Paula Beasley.

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6 DATED this 18th day of September, 2023

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8 GRIGSBY LAW GROUP
A Professional Corporation

9 By: /s/ Aaron Grigsby
10 Aaron D. Grigsby, Esq.
11 Nevada Bar No. 9046
12 2880 W. Sahara Ave.
13 Las Vegas, Nevada 89102

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15 IT IS SO ORDERED:

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17 _____
UNITED STATES DISTRICT JUDGE

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19 DATED: _____
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