

1 Matthew D. Francis (6978)  
Adam P. McMillen (10678)  
2 WATSON ROUNDS  
5371 Kietzke Lane  
3 Reno, NV 89511  
Telephone: 775-324-4100  
4 Facsimile: 775-333-8171  
*Attorneys for Plaintiff Jed Margolin*

REC'D & FILED  
2012 MAR 30 PM 1:00  
ALAN GLOVER  
BY                      CLERK  
~~C. COOPER~~

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6  
7 **In The First Judicial District Court of the State of Nevada**  
8 **In and for Carson City**  
9

10 **JED MARGOLIN, an individual,**

11 **Plaintiff,**

12 **vs.**

13 **OPTIMA TECHNOLOGY CORPORATION,**  
14 **a California corporation, OPTIMA**  
15 **TECHNOLOGY CORPORATION, a Nevada**  
16 **corporation, REZA ZANDIAN aka**  
17 **GOLAMREZA ZANDIANJAZI aka**  
18 **GHOLAM REZA ZANDIAN aka REZA JAZI**  
19 **aka J. REZA JAZI aka G. REZA JAZI aka**  
20 **GHONONREZA ZANDIAN JAZI, an**  
21 **individual, DOE Companies**  
22 **1-10, DOE Corporations 11-20, and DOE**  
23 **Individuals 21-30,**

24 **Defendants.**

Case No.: 090C00579 1B

Dept. No.: 1

**DECLARATION OF ADAM P.**  
**MCMILLEN IN SUPPORT OF**  
**THE NOTICE OF NON-OPPOSITION**  
**TO JOHN PETER LEE, LTD'S**  
**AMENDED MOTION TO**  
**WITHDRAW FROM**  
**REPRESENTATION**

25 I, Adam P. McMillen, being first duly sworn, under oath, depose and say:

26 I am an associate at the law firm of Watson Rounds located at 5371 Kietzke Lane, Reno,  
27 Nevada 89511. I represent the Plaintiff, Jed Margolin, in the above referenced cause of action  
28 against the named Defendants. This declaration is based upon my personal knowledge, and is  
made in support of Plaintiff's Notice of Non-opposition to John Peter Lee, Ltd's Amended  
Motion to Withdraw from Representation of Defendants Optima Technology Corporation, a  
California corporation; Optima Technology Corporation, a Nevada corporation; and Reza

1 Zandian aka Golamreza Zandianjazi aka Gholam Reza Zandian aka Reza Jazi aka J. Reza Jazi  
2 aka G. Reza Jazi aka Ghononreza Zandian Jazi.

3 1. Attached as **Exhibit A** is a true and correct copy of said motion, which was  
4 delivered to Watson Rounds by the U.S. Postal Service on March 16, 2012.

5 I declare under penalty of perjury that the foregoing is true and correct to the best of  
6 my knowledge.

7 **Affirmation Pursuant to NRS 239B.030**

8 The undersigned does hereby affirm that the preceding document does not contain the  
9 social security number of any person.

10 DATED: March 29, 2012

WATSON ROUNDS

11  
12 By: /s/ Adam P. McMillen  
13 Matthew D. Francis  
14 Adam P. McMillen  
15 Watson Rounds  
16 5371 Kietzke Lane  
17 Reno, NV 89511

18 Attorneys for Plaintiff Jed Margolin  
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**CERTIFICATE OF SERVICE**

Pursuant to NRC 5(b), I certify that I am an employee of Watson Rounds, and that on this date, I deposited for mailing, in a sealed envelope, with first-class postage prepaid, a true and correct copy of the foregoing document, **Declaration of Adam P. McMillen in Support of the Notice of Non-Opposition of John Peter Lee, Ltd's Amended Motion to Withdraw from Representation**, addressed as follows:

John Peter Lee  
John Peter Lee, Ltd.  
830 Las Vegas Blvd. South  
Las Vegas, NV 89101

Dated: March 29, 2012

  
\_\_\_\_\_  
Carla Ousby

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Index of Exhibits

Exhibit No.	Description	No. of Pages
A	A true and correct copy of John Peter Lee, Ltd's Amended Motion to Withdraw from Representation of Defendants Optima Technology Corporation, a California corporation; Optima Technology Corporation, a Nevada corporation; and Reza Zandian aka Golanreza Zandianjazi aka Gholam Reza Zandian aka Reza Jazi aka J. Reza Jazi aka G. Reza Jazi aka Ghononreza Zandian Jazi,	6

# Exhibit A

Exhibit A

**JOHN PETER LEE, L.L.D.**  
ATTORNEYS AT LAW  
830 LAS VEGAS BLVD. SOUTH  
LAS VEGAS, NEVADA 89101  
Telephone (702) 382-4044  
Telecopier (702) 383-9950

1 **MWCN**  
JOHN PETER LEE, LTD.  
2 JOHN PETER LEE, ESQ.  
Nevada Bar No. 001768  
3 JOHN C. COURTNEY, ESQ.  
Nevada Bar No. 011092  
4 830 Las Vegas Boulevard South  
Las Vegas, Nevada 89101  
5 (702) 382-4044 Fax: (702) 383-9950  
e-mail: [info@johnpeterlee.com](mailto:info@johnpeterlee.com)  
6 Attorneys for Defendants  
*Optima Technology Corporation,*  
7 *Optima Technology Corporation, and*  
*Reza Zandian aka Golamreza Zandianjazi*  
8 *aka Gholamreza Zandianjazi aka Gholam Reza Zandian*  
*aka Reza Jazi aka J. Reza Jazi aka G. Reza Jazi aka*  
9 *Ghononreza Zandian Jazi*

10 **IN THE FIRST JUDICIAL DISTRICT COURT OF THE STATE OF NEVADA**  
11 **IN AND FOR CARSON CITY**

12 JED MARGOLIN, an individual;  
13  
14 Plaintiff,

Case No.: 090C00579  
Dept. No.: I

14 vs.

15 OPTIMA TECHNOLOGY CORPORATION,  
a California corporation, OPTIMA  
16 TECHNOLOGY CORPORATION, a Nevada  
corporation, REZA ZANDIAN aka  
17 GOLAMREZA ZANDIANJAZI aka  
GHOLAM REZA ZANDIAN aka REZA  
18 JAZI aka J. REZA JAZI AKA G. REZA JAZI  
aka GHONONREZA ZANDIAN JAZI, an  
19 individual, DOE Companies 1-10; DOE  
Corporations 11-20, and DOE Individuals 21-  
20 30,

21 Defendants.

1334.023382-td

22 **JOHN PETER LEE, LTD.'S AMENDED MOTION TO WITHDRAW FROM**  
23 **REPRESENTATION OF DEFENDANTS OPTIMA TECHNOLOGY CORPORATION, A**  
24 **NEVADA CORPORATION; AND REZA ZANDIAN aka GOLAMREZA ZANDIANJAZI**  
25 **aka GHOLAM REZA ZANDIAN aka REZA JAZI aka J. REZA JAZI AKA G. REZA**  
**JAZI aka GHONONREZA ZANDIAN JAZI**

26 COMES NOW, the law firm of JOHN PETER LEE, LTD., (the Firm) and moves this  
27 Honorable Court for an Order to Withdraw from representation of Defendants OPTIMA  
28 TECHNOLOGY CORPORATION, A CALIFORNIA CORPORATION; OPTIMA TECHNOLOGY

**JOHN PETER LEE, LTD.**  
ATTORNEYS AT LAW  
830 LAS VEGAS BLVD. SOUTH  
LAS VEGAS, NEVADA 89101  
Telephone (702) 382-4044  
Telecopier (702) 383-9950

1 CORPORATION, A NEVADA CORPORATION; AND REZA ZANDIAN aka GOLAMREZA  
2 ZANDIANJAZI aka GHOLAM REZA ZANDIAN aka REZA JAZI aka J. REZA JAZI AKA G.  
3 REZA JAZI aka GHONONREZA ZANDIAN JAZI.

4 This Motion is made pursuant to EDCR 7.40(b)(2). This Motion is based upon the  
5 following Points and Authorities, all pleadings and papers on file herein, and the Affidavit of counsel  
6 attached hereto.

7 **NOTICE OF MOTION**

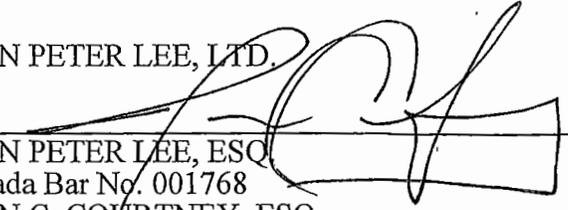
8 TO: JED MARGOLIN, Plaintiff;

9 TO: MATTHEW D. FRANCIS, ESQ., and ADAM P. MCMILLEN, Attorneys for Plaintiff;

10 YOU WILL PLEASE TAKE NOTICE that the undersigned will bring the foregoing JOHN  
11 PETER LEE, LTD.'S AMENDED MOTION TO WITHDRAW FROM REPRESENTATION OF  
12 DEFENDANTS OPTIMA TECHNOLOGY CORPORATION, A CALIFORNIA CORPORATION;  
13 OPTIMA TECHNOLOGY CORPORATION, A NEVADA CORPORATION; AND REZA  
14 ZANDIAN aka GOLAMREZA ZANDIANJAZI aka GHOLAM REZA ZANDIAN aka REZA JAZI  
15 aka J. REZA JAZI AKA G. REZA JAZI aka GHONONREZA ZANDIAN JAZI on for hearing  
16 before the above entitled Court on the \_\_\_\_\_ day of \_\_\_\_\_, 2012,  
17 at the hour of \_\_\_:00 \_\_.m. of said date, in Department XIX or as soon thereafter as Counsel can be  
18 heard.

19 DATED this 13<sup>th</sup> day of March, 2012.

20 JOHN PETER LEE, LTD.

21 BY:   
22 JOHN PETER LEE, ESQ.  
23 Nevada Bar No. 001768  
24 JOHN C. COURTNEY, ESQ.  
25 Nevada Bar No. 011092  
26 830 Las Vegas Boulevard South  
27 Las Vegas, Nevada 89101  
28 Ph: (702) 382-4044  
Attorneys for Defendants  
*Optima Technology Corporation,  
Optima Technology Corporation, and  
Reza Zandian aka Golamreza Zandianjazi  
aka Gholamreza Zandianjazi aka Gholam Reza  
Zandian aka Reza Jazi aka J. Reza Jazi aka G. Reza  
Jazi aka Ghononreza Zandian Jazi*



1 3. To the best of Declarant's knowledge and belief the last known address and telephone  
2 number at which Plaintiffs may be served or reached with notice of further proceedings taken in this  
3 action is:

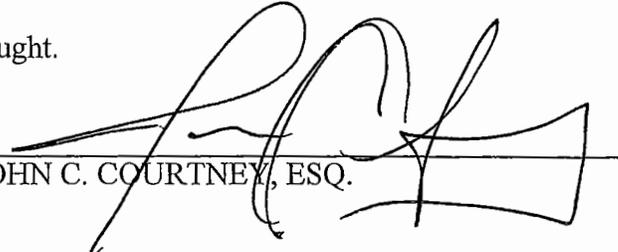
4 Reza Zandian  
5 8775 Costa Verde Blvd.  
6 San Diego, California 92122

7 4. The primary reason for requesting withdrawal is that the client no longer wishes to  
8 pay fees to John Peter Lee, Ltd. for services rendered, or to be rendered, in the instant case.

9 5. There are also other reasons that the instant motion to withdraw as counsel is made;  
10 however, Declarant does not wish to state said other reasons unless specifically compelled by the  
11 Court, particularly because Declarant does not wish to reveal any more attorney-client privileged  
12 information than that which is absolutely necessary in order for the Court to grant the instant motion  
13 for withdrawal as counsel.

14 6. This Declaration is made in good faith.

15 FURTHERMORE, Declarant sayeth naught.

16   
17 JOHN C. COURTNEY, ESQ.

18 **POINTS AND AUTHORITIES**

19 Pursuant to EDCR 7.40(b)(2)(ii), Counsel in any case may be changed only ... (2) When no  
20 attorney has been retained to replace the attorney withdrawing, by order of the court, granted upon  
21 written motion, and

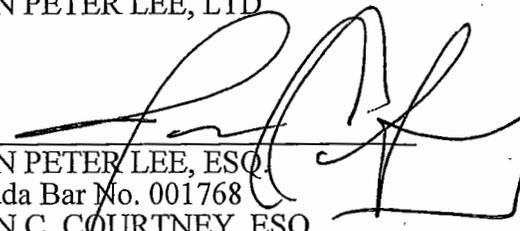
22 (i) If the application is made by the attorney, the attorney must  
23 include in an affidavit the address, or last known address, at which  
24 the client may be served with notice of further proceedings taken in  
25 the case in the event the application for withdrawal is granted, and the  
26 telephone number, or last known telephone number, at which the  
27 client may be reached and the attorney must serve a copy of the  
28 application upon the client and all other parties to the action or their  
attorneys.

29 Pursuant to the above statutes and case law, John Peter Lee, Ltd. requests this Court for leave  
30 to withdraw as counsel for Defendants OPTIMA TECHNOLOGY, A CALIFORNIA

1 CORPORATION; OPTIMA TECHNOLOGY CORPORATION, A NEVADA CORPORATION;  
2 AND REZA ZANDIAN aka GOLAMREZA ZANDIANJAZI aka GHOLAM REZA ZANDIAN  
3 aka REZA JAZI aka J. REZA JAZI AKA G. REZA JAZI aka GHONONREZA ZANDIAN JAZI,  
4 as the Firm has complied with the requirements of the local rule for withdrawal, as attached and  
5 incorporated herein in the Declarant of counsel, John C. Courtney, Esq., setting forth the grounds  
6 for the Firm's Motion.

7 DATED this 13<sup>th</sup> day of March, 2012.

8 JOHN PETER LEE, LTD

9  
10 BY:   
11 JOHN PETER LEE, ESQ.  
12 Nevada Bar No. 001768  
13 JOHN C. COURTNEY, ESQ.  
14 Nevada Bar No. 011092  
15 830 Las Vegas Boulevard South  
16 Las Vegas, Nevada 89101  
17 Ph: (702) 382-4044/Fax: (702) 383-9950  
18 Attorneys for Defendants  
19 *Optima Technology Corporation,*  
20 *Optima Technology Corporation, and*  
21 *Reza Zandian aka Golamreza Zandianjazi*  
22 *aka Gholamreza Zandianjazi aka Gholam Reza*  
23 *Zandian aka Reza Jazi aka J. Reza Jazi aka G. Reza*  
24 *Jazi aka Ghononreza Zandian Jazi*

