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

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

- 4. The primary reason for requesting withdrawal is that the client no longer wishes to pay fees to John Peter Lee, Ltd. for services rendered, or to be rendered, in the instant case.
- 5. There are also other reasons that the instant motion to withdraw as counsel is made; however, Declarant does not wish to state said other reasons unless specifically compelled by the Court, particularly because Declarant does not wish to reveal any more attorney-client privileged information than that which is absolutely necessary in order for the Court to grant the instant motion for withdrawal as counsel.
  - 6. This Declaration is made in good faith. FURTHERMORE, Declarant sayeth naught.

JOHN C. COURTNEY, ESC

## POINTS AND AUTHORITIES

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

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

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