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Attorneys for Defendant
Andrew Anglin

RANDAZZA | LEGAL GROUP

**UNITED STATES DISTRICT COURT
DISTRICT OF MONTANA
MISSOULA DIVISION**

TANYA GERSH,)	Case No. 9:17-cv-50-DLC-JCL
Plaintiff,)	MOTION FOR LEAVE OF COURT TO WITHDRAW AS ATTORNEYS OF RECORD
vs.)	
ANDREW ANGLIN,)	
Defendant.)	
)	

COME NOW Marc J. Randazza, Jay M. Wolman, *pro hac vice* attorneys of record at Randazza Legal Group (“RLG”) and Mathew M. Stevenson of Missoula, Montana (“Stevenson”), presently counsel for Defendant Andrew Anglin, an

individual, and hereby move this Court for leave to withdraw as counsel pursuant to District of Montana Local Rule (“LR”) 83.3 and Rule 1.16 of Professional Conduct for Montana (“MRPC”).

As set forth in the accompanying memorandum, filed herewith, and *ex parte* affidavit, filed separately, there is good cause to allow leave to withdraw as the attorney-client relationship has broken down between Attorneys and Defendant. Notice to Defendant under LR 83.3(b)(2)(B)(i) was given on April 16, 2019, fourteen days prior to this date. *See Exhibit A*. Mr. Anglin was advised of his obligation immediately to retain new counsel or appear *pro se* if the motion to withdraw is granted. *See id.* Defendant’s last known address(es) appear in the certificate of service below. Per Order of the Court, Movants are filing under seal those documents previously designated as Attorneys' Eyes Only under the Protective Order.

WHEREFORE Movants respectfully request this Honorable Court permit counsel for Defendant to withdraw their appearances.

Dated: April 30, 2019.

Respectfully submitted,

/s/ Marc J. Randazza

Marc J. Randazza (*pro hac vice*)
RANDAZZA LEGAL GROUP, PLLC
2764 Lake Sahara Drive, Suite 109
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/s/ Jay M. Wolman

Jay M. Wolman (*pro hac vice*)
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/s/ Mathew M. Stevenson

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1120 Kensington, Suite B
Missoula, MT 59801

*Attorneys for Defendant,
Andrew Anglin*

Case No. 9:17-cv-50-DLC-JCL

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on April 30, 2019, a copy of the foregoing was served via CM/ECF upon all parties as follows:

John Morrison
Robert Farris-Olsen
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401 N. Last Chance Gulch St.
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RANDAZZA | LEGAL GROUP

And Defendant Andrew Anglin was served by mail and electronically as follows:

- 1) Via Email
Andrew Anglin
<andrewanglin84@gmail.com>
- 2) Via Electronic Messaging Service Signal
Andrew Anglin
[REDACTED]
- 3) **Andrew Anglin**
6827 N High Street, Suite 121,
Worthington, Ohio 43085
- 4) **Andrew Anglin**
3827 N High Street, Suite 121,
Worthington, Ohio 43085
- 5) **Andrew Anglin**
7407 Brandshire Ln. Apt. B,
Dublin, Ohio 43017
- 6) **Andrew Anglin**
915 N High Street,
Columbus, Ohio 43201

/s/ Marc J. Randazza

Marc J. Randazza

EXHIBIT A

Marc J. Randazza (*pro hac vice*)
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Tel: (406) 721-7000
matstevenson@bigskylegal.com

Attorneys for Defendant
Andrew Anglin

**UNITED STATES DISTRICT COURT
DISTRICT OF MONTANA
MISSOULA DIVISION**

TANYA GERSH,

Plaintiff,

vs.

ANDREW ANGLIN,

Defendant.

Case No. 9:17-cv-50-DLC-JCL

**NOTICE OF INTENT TO FILE
MOTION TO WITHDRAW AS
ATTORNEYS OF RECORD**

PLEASE TAKE NOTICE that Marc J. Randazza, Jay M. Wolman, *pro hac vice* attorneys of record at Randazza Legal Group (“RLG”) and Matthew M. Stevenson of Missoula, Montana (“Stevenson”), presently counsel for Defendant,

hereby put you, Andrew Anglin, on notice that we intend to withdraw as counsel of record in the above captioned case. We intend to file a motion to withdraw 14 days from the date you have been served with this notice, pursuant to District of Montana Local Rule (“LR”) 83.3(b)(2)(B).

Please be advised that, if the motion to withdraw is granted, you are obligated to immediately retain new counsel or appear *pro se* (meaning you will be representing yourself).

The facts constituting good cause supporting withdrawal are set forth in the accompanying *ex parte* affidavit, attached hereto as “Exhibit A”.

Dated: April 16, 2019.

Respectfully submitted,

/s/ Marc J. Randazza

Marc J. Randazza (*pro hac vice*)
RANDAZZA LEGAL GROUP, PLLC
2764 Lake Sahara Drive, Suite 109
Las Vegas, Nevada 89117

/s/ Jay M. Wolman

Jay M. Wolman (*pro hac vice*)
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Hartford, Connecticut 06103

/s/ Mathew M. Stevenson

Mathew M. Stevenson
STEVENSON LAW OFFICE
1120 Kensington, Suite B
Missoula, MT 59801

*Attorneys for Defendant,
Andrew Anglin*

Case No. 9:17-cv-50-DLC-JCL

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on April 16, 2019, a copy of the foregoing was served via electronic mail and U.S. Mail on Defendant Andrew Anglin as follows.

- 1) Via Email
Andrew Anglin
<andrewanglin84@gmail.com>

- 2) Via Electronic Messaging Service Signal
Andrew Anglin
[REDACTED]

- 3) **Andrew Anglin**
6827 N High Street, Suite 121,
Worthington, Ohio 43085

- 4) **Andrew Anglin**
3827 N High Street, Suite 121,
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- 5) **Andrew Anglin**
7407 Brandshire Ln. Apt. B,
Dublin, Ohio 43017

- 6) **Andrew Anglin**
915 N High Street,
Columbus, Ohio 43201

/s/ Marc J. Randazza

Marc J. Randazza

RANDAZZA | LEGAL GROUP

**UNITED STATES DISTRICT COURT
DISTRICT OF MONTANA
MISSOULA DIVISION**

TANYA GERSH,)	Case No. 9:17-cv-50-DLC-JCL
)	
Plaintiff,)	
)	
vs.)	DECLARATION OF MARC J. RANDAZZA
)	
ANDREW ANGLIN,)	
)	
Defendant.)	

I, Marc J. Randazza, declare:

1. I am over the age of 18 years and am fully competent to make this Declaration. The facts set forth in this Declaration are within my personal knowledge and are true and correct to the best of my knowledge and belief.
2. I am currently counsel of record for Defendant Andrew Anglin.
3. I am the Managing Partner of Randazza Legal Group, PLLC (“RLG”).
4. On May 11, 2017, RLG entered into a Representation Agreement with Defendant Andrew Anglin.
5. On or around that same time, Anglin entered into a second Representation Agreement with Attorney Mathew Stevenson at the Stevenson Law Office (“SLO”).
6. Under the terms of the Representation Agreements, Anglin agreed to fulfill certain obligations.
7. Anglin has failed in his obligations to Attorneys under the representation agreement, including, but not limited to, his failure to comply with

obligations set forth by the Court including the Court's Order that he appear in the United States for deposition and other . The attorney-client relationship has thus broken down and cannot be repaired.

8. Pursuant to L.R. 83.3, I served Anglin with a notice of intent to withdraw on Anglin 14 days prior to filing this motion for leave to withdraw.

9. I have advised Anglin of his obligation to immediately retain new counsel or appear pro se if the motion to withdraw is granted.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Dated: April 30, 2019.

/s/ Marc J. Randazza
Marc J. Randazza

UNITED STATES DISTRICT COURT
DISTRICT OF MONTANA
MISSOULA DIVISION

TANYA GERSH,

Plaintiff,

vs.

ANDREW ANGLIN,

Defendant.

)
)
) Case No. 9:17-cv-50-DLC-JCL
)
)
)

**[PROPOSED] ORDER
GRANTING MOTION TO
WITHDRAW**

Upon consideration of the Motion for Leave of Court to Withdraw as attorneys of Record (Dkt. No. ____), and any opposition(s) thereto, this Court finds that present appearing counsel for Defendant, Andrew Anglin, have shown good cause as to why they should be permitted to withdraw their appearances on his behalf in this matter, and it is, therefore

ORDERED that the Motion for Leave of Court to Withdraw as Attorneys of Record is hereby GRANTED; and it is

FURTHER ORDERED that the appearances of Attorneys Marc Randazza, Jay Wolman, and Mathew Stevenson are hereby WITHDRAWN and that such Attorneys have no further obligations to Defendant in this matter.

Dated this ____ day of _____ 2019.

, U.S.D.J./U.S.M.J
DISTRICT OF MONTANA
MISSOULA DIVISION