

CASE NAME:

DYLAN YEISER-FODNESS VS MASTER DOG TRAINING et al

CASE NUMBER:

22STCV21852

NOTICE TO CLIENT

If this motion to be relieved as counsel is granted, your present attorney will no longer be representing you. You may not in most cases represent yourself if you are one of the parties on the following list:

- A guardian
- A conservator
- A trustee
- A personal representative
- A probate fiduciary
- A corporation
- A guardian ad litem
- An unincorporated association

If you are one of these parties, YOU SHOULD IMMEDIATELY SEEK LEGAL ADVICE REGARDING LEGAL REPRESENTATION. Failure to retain an attorney may lead to an order striking the pleadings or to the entry of a default judgment.

5. If this motion is granted and a client is representing himself or herself, the client will be solely responsible for the case.

NOTICE TO CLIENT WHO WILL BE UNREPRESENTED

If this motion to be relieved as counsel is granted, you will not have an attorney representing you. You may wish to seek legal assistance. If you do not have a new attorney to represent you in this action or proceeding, and you are legally permitted to do so, you will be representing yourself. It will be your responsibility to comply with all court rules and applicable laws. If you fail to do so, or fail to appear at hearings, action may be taken against you. You may lose your case.

6. If this motion is granted, the client must keep the court informed of the client's current address.

NOTICE TO CLIENT WHO WILL BE UNREPRESENTED

If this motion to be relieved as counsel is granted, the court needs to know how to contact you. If you do not keep the court and other parties informed of your current address and telephone number, they will not be able to send you notices of actions that may affect you, including actions that may adversely affect your interests or result in your losing the case.

Date: 04/25/2023

NATALIA FOLEY (SBN 295923)

(TYPE OR PRINT NAME)



(SIGNATURE OF ATTORNEY)

Attorney for (name): Ekaterina Korotun

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, state bar number, and address): Natalia Foley Esq (SBN 295923) Law Offices of Natalia Foley 751 S Weir Canyon Rd Ste 157-455 Anaheim CA 92808 TELEPHONE NO.: 714 948 5054 FAX NO.: 310 626 9632 ATTORNEY FOR (Name): 5 STAR K-9 ACADEMY, Inc, Ekaterina Korotun	FOR COURT USE ONLY
NAME OF COURT: The Los Angeles Superior Court STREET ADDRESS: 111 North Hill Street MAILING ADDRESS: 111 North Hill Street CITY AND ZIP CODE: Los Angeles CA 90012 BRANCH NAME: STANLEY MOSK COURTHOUSE	
CASE NAME: DYLAN YEISER-FODNESS VS MASTER DOG et al	CASE NUMBER: 22STCV21852
DECLARATION IN SUPPORT OF ATTORNEY'S MOTION TO BE RELIEVED AS COUNSEL—CIVIL	HEARING DATE: 05/22/2023 DEPT.: 510 TIME: 9 am BEFORE HON.: Armen Tamzarian DATE ACTION FILED: 07/06/2022 TRIAL DATE: 02/07/2024

1. **Attorney and Represented Party.** Attorney (name): Natalia Foley (SBN 2995923) is presently counsel of record for (name of party): 5 STAR K-9 ACADEMY, Inc , Ekaterina Korotun in the above-captioned action or proceeding.
2. **Reasons for Motion.** Attorney makes this motion to be relieved as counsel under Code of Civil Procedure section 284(2) instead of filing a consent under section 284(1) for the following reasons (describe):

There has been a breakdown of the working relationship with the client. The specific facts which give rise to this motion are confidential and require to be kept confidential pursuant to Business and Professions Code Sec.6068(e), rule 3-100(A), California Rules of Professional conduct and by the attorney-client privilege (Evidence code sec 950 et sec). In the event that this court desires further information to ascertain the good faith basis for this motion and for withdrawal, it is respectfully requested that the court have an in camera hearing outside of the presence of all other parties so that the specific facts demonstrating good cause for this withdrawal may be demonstrated to the court (Manfredi & Levine v Superior Court (1998) 66 Cal.App.4th 1128, 1136-1137; 3-700(B) or (C).) The client was advised on upcoming deadlines, encouraged to hire a new counsel, and will not be prejudiced at this stage

Continued on Attachment 2.

3. **Service**

a. Attorney has

- (1) personally served the client with copies of the motion papers filed with this declaration. A copy of the proof of service will be filed with the court at least 5 days before the hearing.
- (2) served the client by mail at the client's last known address with copies of the motion papers served with this declaration.

b. If the client has been served by mail at the client's last known address, attorney has

- (1) confirmed within the past 30 days that the address is current
- (a) by mail, return receipt requested.
- (b) by telephone.
- (c) by conversation.
- (d) by other means (specify):

(Continued on reverse)

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3. b. (2) been unable to confirm that the address is current or to locate a more current address for the client after making the following efforts:
- (a) mailing the motion papers to the client's last known address, return receipt requested.
- (b) calling the client's last known telephone number or numbers.
- (c) contacting persons familiar with the client (*specify*):
- (d) conducting a search (*describe*):
- (e) other (*specify*):
- c. Even if attorney has been unable to serve the client with the moving papers, the court should grant attorney's motion to be relieved as counsel of record (*explain*):
4. The next hearing scheduled in this action or proceeding
- a. is not yet set.
- b. is set as follows (*specify the date, time, and place*):
see attachment 6
- c. concerns (*describe the subject matter of the hearing*):
- Continued on Attachment 4.
5. The following additional hearings and other proceedings (including discovery matters) are presently scheduled in this case (*for each, describe the date, time, place, and subject matter*):
see attachment 6
- Continued on Attachment 5.

6. Trial in this action or proceeding
- a. is not yet set.
- b. is set as follows (*specify the date, time, and place*):
02/07/2024 at 10:00 AM in Department 52 at 111 North Hill Street, Los Angeles, CA 90012 Jury Tr
7. **Other.** Other matters that the court should consider in determining whether to grant this motion are the following (*explain*):
- (i) Plaintiff just amended his complaint on 04/07/2023 , the due date to answer is 05/07/2023; (ii) the discovery is pending; (iii) Defendant did not voluntarily consent to counsel's request to be relieved as attorneys of record; (iv) there has been a breakdown of the attorney-client relationship; (v) irreconcilable differences have arisen between Defendant and counsel making it unreasonably difficult to carry out the effective representation of Defendant.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Date: 4/25/2023

Natalia Foley Esq (SBN 295923)

(TYPE OR PRINT NAME)


(SIGNATURE OF DECLARANT)

8. Number of pages attached: _____

Attachment 2

To declaration in support of Attorney' motion to be relieved as counsel

1. I Natalia Foley, am a member of the state Bar of California (295923) and declare s following:
2. Beginning April of 2023, I have determined that that there has been an irreconcilable breakdown in the attorney-client relationship. On several occasions, I has requested that Defendant find substitute counsel and has asked Defendant to complete, sign and return a Substitution of Attorney Form (Form MC-050). However, as of the filing of this motion, substitute counsel has not appeared. Further, while asked, Defendant has not voluntarily consented to my request to be relieved as counsel.
3. I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct, and that this declaration was executed on April 21, 2023 at Los Angeles, CA



Attachment 6

Future hearings:

04/25/2023 at 10:30 AM in Department 52 at 111 North Hill Street, Los Angeles, CA 90012
Informal Discovery Conference (IDC)

05/04/2023 at 09:00 AM in Department 52 at 111 North Hill Street, Los Angeles, CA 90012
Hearing on Motion to Compel Arbitration

01/22/2024 at 09:00 AM in Department 52 at 111 North Hill Street, Los Angeles, CA 90012
Final Status Conference

02/07/2024 at 10:00 AM in Department 52 at 111 North Hill Street, Los Angeles, CA 90012
Jury Trial

ATTORNEY OR PARTY WITHOUT ATTORNEY (<i>Name, state bar number, and address</i>): Natalia Foley Esq (SBN 295923) Law Offices of Natalia Foley 751 S Weir Canyon Rd Ste 157-455 Anaheim CA 92808 TELEPHONE NO.: 714 948 5054 FAX NO. (<i>Optional</i>): 310 626 9632 E-MAIL ADDRESS (<i>Optional</i>): nfolelaw@gmail.com ATTORNEY FOR (<i>Name</i>): 5 STAR K-9 ACADEMY, Inc, Ekaterina Korotun	FOR COURT USE ONLY
SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES STREET ADDRESS: 111 North Hill Street MAILING ADDRESS: 111 North Hill Street CITY AND ZIP CODE: Los Angeles CA 90012 BRANCH NAME: STANLEY MOSK COURTHOUSE	
CASE NAME: DYLAN YEISER-FODNESS VS MASTER DOG et al	CASE NUMBER: 22STCV21852
ORDER GRANTING ATTORNEY'S MOTION TO BE RELIEVED AS COUNSEL—CIVIL	HEARING DATE: 05/22/2023 DEPT.: 52 TIME: 9 am BEFORE HON.: Armen Tamzarian DATE ACTION FILED: 07/06/2022 TRIAL DATE: 02/07/2024

1. The motion of (*name of attorney*): Natalia Foley (SBN 2995923) to be relieved as counsel of record for (*name of client*): 5 STAR K-9 ACADEMY, Inc , Ekaterina Korotun , a party to this action or proceeding, came on regularly for hearing at the date, time, and place indicated above.
2. The following persons were present at the hearing:

FINDINGS

3. Attorney has
 - a. personally served the client with papers in support of this motion.
 - b. served client by mail and submitted a declaration establishing that the service requirements of California Rules of Court, rule 3.1362, have been satisfied.
4. Attorney has shown sufficient reasons why the motion to be relieved as counsel should be granted and why the attorney has brought a motion under Code of Civil Procedure section 284(2) instead of filing a consent under section 284(1).

ORDER

5. Attorney is relieved as counsel of record for client
 - a. effective upon the filing of the proof of service of this signed order upon the client.
 - b. effective on (*specify date*):
6. The client's current last known address and telephone number:

If the client's current address is known, service on the client must hereafter be made at that address unless otherwise ordered in item 13. If the current address is not known, service must be made according to Code of Civil Procedure section 1011 (b) and rule 3.252 of the California Rules of Court.

7. a. The next scheduled hearing in this action or proceeding is set for (*date, time, and place*):
- b. The hearing will concern (*subject matter*):

NOTICE TO CLIENT You or your new attorney, if any, must prepare for and attend this hearing.
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CASE NAME: DYLAN YEISER-FODNESS VS MASTER DOG et al	CASE NUMBER: 22STCV21852
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8. The following additional hearings and other proceedings (including discovery matters) are set in this action (*describe the date, time, place, and subject matter of each*):
9. The trial in this action or proceeding:
- a. is not yet set.
- b. is set for (*specify date, time, and place*):
10. Client is hereby notified of the following effects this order may have upon parties.

NOTICE TO CLIENT

Your present attorney will no longer be representing you. You may not in most cases represent yourself if you are one of the parties on the following list:

- A guardian
- A conservator
- A trustee
- A personal representative
- A probate fiduciary
- A corporation
- A guardian ad litem
- An unincorporated association

If you are one of these parties, YOU SHOULD IMMEDIATELY SEEK LEGAL ADVICE REGARDING LEGAL REPRESENTATION. Failure to retain an attorney may lead to an order striking the pleadings or to the entry of a default judgment.

11. Client is notified that, if the client will be representing himself or herself, the client shall be solely responsible for the case.

NOTICE TO CLIENT WHO WILL BE UNREPRESENTED

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12. Client is notified that it is the client's duty to keep the court informed at all times of the client's current address.

NOTICE TO CLIENT WHO WILL BE UNREPRESENTED

The court needs to know how to contact you. If you do not keep the court and other parties informed of your current address and telephone number, they will not be able to send you notices of actions that may affect you, including actions that may adversely affect your interests or result in your losing the case.

13. The court further orders (*specify*):

Date:

JUDGE OR JUDICIAL OFFICER

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**SUPERIOR COURT OF CALIFORNIA
LOS ANGELES COUNTY SUPERIOR COURT
PROOF OF SERVICE**

DYLAN YEISER-FODNESS vs MASTER DOG) Case No.: 22STCV21852
TRAINING ET AL.) PROOF OF SERVICE
_____)

I am employed in the county of Los Angeles, State of California.
I am over the age of 18 years and not a party to the within action; my business address is:
**751 S Weir Canyon Rd Ste 157-455
Anaheim CA 92808**

I am readily familiar with the firm's business practice of processing correspondence for mailing. In the ordinary course of business, the correspondence would be deposited with the United States Postal Service on that same day with postage thereon fully prepaid at my business address above. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after the date of deposit for mailing as listed.

On 4/25/2023 I served the foregoing documents described as:

Motion to be relieved as counsel, declaration in support, proposed order
on the interested parties in this action, by placing a true copy thereof in a sealed envelope with postage thereon fully prepaid, in the United States Mail at my address stated above, addressed as follows:

Attorney for Plaintiff:

Young W Ryu, Esq
LOYR, APC
1055 West 7th Street, Suite 2290
Los Angeles CA 90017

DEFENDANT Ekaterina Korotun: 19401 PARTHENIA ST APT 4082 NORTHRIDGE, CA 91324
Defendant 5 STAR K-9 ACADEMY, Inc: 19401 PARTHENIA ST APT 4082 NORTHRIDGE, CA 91324

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on: 4/25/2023 at Los Angeles, CA

By IRINA PALEES,
Legal Assistant to Attorney
Natalia Foley, Esq



Make a Reservation

DYLAN YEISER-FODNESS vs MASTER DOG TRAINING, A CALIFORNIA CORPORATION, et al.

Case Number: 22STCV21852 Case Type: Civil Unlimited Category: Wrongful Termination

Date Filed: 2022-07-06 Location: Stanley Mosk Courthouse - Department 52

Reservation

Case Name:

DYLAN YEISER-FODNESS vs MASTER DOG TRAINING,
A CALIFORNIA CORPORATION, et al.

Case Number:

22STCV21852

Type:

Motion to Be Relieved as Counsel

Status:

RESERVED

Filing Party:

Ekaterina Korotun (Defendant)

Location:

Stanley Mosk Courthouse - Department 52

Date/Time:

05/22/2023 9:00 AM

Number of Motions:

1

Reservation ID:

940463167397

Confirmation Code:

CR-XRG7MAVZNJP6KCWBF

Fees

Description	Fee	Qty	Amount
Motion to Be Relieved as Counsel *** Fees Exempted by Fee Waiver ***	60.00	1	0.00
TOTAL			\$0.00

Payment

Amount:

\$0.00

Type:

FEE_WAIVER

Account Number:

n/a

Authorization:

n/a

Payment Date:

1969-12-31

Print Receipt

[+ Reserve Another Hearing](#)