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Attorney for Plaintiff,  
LIBERTY MEDIA HOLDINGS, LLC

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLORADO

LIBERTY MEDIA HOLDINGS, LLC

Plaintiff,

vs.

SHENG GAN f/k/a PROTECTED DOMAIN  
SERVICES CUSTOMER NCR-3356109  
d/b/a SITERIPKING.COM and JOHN DOES  
2-10

Defendant.

Case No. 1:11-cv-02754-MSK-KMT

**AMENDED NOTICE OF MOTION AND  
MOTION TO WITHDRAW AS ATTORNEY  
OF RECORD**

Marc J. Randazza (“Randazza”) respectfully moves this Court for an Order permitting him to withdraw as counsel for Liberty Media Holdings, LLC (“Liberty”) in the above-entitled matter, pursuant to D.C.COLO.LCivR 83.3(D). In support thereof, the undersigned states as follows:

1. Liberty explicitly instructed Randazza to cease action in this case.

2. Liberty retained the firm Greenberg Traurig LLP, which took over representation on other Liberty matters.

3. Shortly thereafter, Liberty replaced Greenberg Traurig with Brownstein Hyatt for all pending matters.

4. Since the instruction to cease action, Liberty has declined to communicate with Randazza about this case.

5. Randazza advised Liberty's other counsel on multiple occasions about pending deadlines and a need to substitute in on this case, but has received no response.

6. Without client approval to act, Randazza cannot continue to represent Liberty in this case and requests that the Court allow him to withdraw as counsel of record.

7. Randazza has complied with the notification requirements of D.C.COLOR.LCivR 83.3(D). Please see the Notice of Withdrawal attached hereto.

8. The relief requested in this Motion is sought in good faith and not for the purposes of delay.

9. In order to preserve Liberty's rights, Liberty should be given at least thirty (30) days in which to name substitute counsel in this action.

Dated: December 17, 2012

Respectfully submitted,  
s/ Marc J. Randazza  
Marc J. Randazza, Esq.  
6525 Warm Springs Road, Suite 100  
Las Vegas, NV 89118  
888-667-1113, 305-437-7662 (fax)  
ecf@randazza.com

**CERTIFICATE OF SERVICE**

Pursuant to Federal Rule of Civil Procedure 5(b), I HEREBY CERTIFY that on December 17, 2012, I caused a copy of the foregoing document and all attachments to be served via the Court's CM/ECF system, as well as depositing a copy of the foregoing in the United States mail to the following persons:

Liberty Media Holdings, LLC  
4262 Blue Diamond Road  
Suite 102-377  
Las Vegas, NV 89139

s/ Marc J. Randazza

Marc J. Randazza, Esq.,  
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LIBERTY MEDIA HOLDINGS, LLC

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2-10

Defendant.

Case No. 1:11-cv-02754-MSK-KMT

**NOTICE OF WITHDRAWAL OF  
APPEARANCE**

In accordance with D.C.COLO.LCivR 83.3(D), the undersigned states as follows:

1. The undersigned intends to withdraw as attorney of record for Liberty Media Holdings, LLC (“Liberty”) in the above-entitled case.

2. Pursuant to D.C.COLO.LCivR 83.3(D), the undersigned hereby notifies Liberty of the following: a) Liberty is personally responsible for complying with all court orders and time limitations established by any applicable rules; and b) Liberty cannot appear without

counsel admitted to practice before this court, and absent any prompt appearance of substitute counsel, pleadings, motions, and other papers may be stricken and default judgment or other sanctions may be imposed against the entity.

Dated: December 17, 2012

Respectfully submitted,  
s/ Marc J. Randazza  
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Las Vegas, NV 89118  
888-667-1113  
305-437-7662 (fax)  
ecf@randazza.com  
Attorney for Plaintiff  
Liberty Media Holdings, LLC

**CERTIFICATE OF SERVICE**

Pursuant to Federal Rule of Civil Procedure 5(b), I HEREBY CERTIFY that on December 17, 2012, I caused a copy of the NOTICE OF WITHDRAWAL OF APPEARANCE to be served via United States mail to the following persons:

Liberty Media Holdings, LLC  
4262 Blue Diamond Road  
Suite 102-377  
Las Vegas, NV 89139

s/ Marc J. Randazza