

**IN THE UNITES STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO**

UNITED STATES OF AMERICA and)	
STATE OF NEW MEXICO <i>ex rel,</i>)	
STATE ENGINEER,)	No. 01cv00072-MV/WPL
)	
Plaintiffs,)	ZUNI RIVER BASIN
)	ADJUDICATION
v.)	
)	Subfile No: ZRB-4-0453
A & R Productions et al,)	
)	
Defendants.)	

**MOTION TO WITHDRAW AS
COUNSEL OF RECORD**

COMES NOW, Tanya L. Scott and Law & Resource Planning Associates, P.C. (“LRPA”) and hereby move the Court pursuant to D.N.M.LR-Civ. 83.8(a) for an Order allowing their withdrawal as counsel of record for Theodore Broderick in Subfile No. ZRB-4-0453.

As grounds for this Motion, LRPA states that it has lost all contact with Theodore Broderick. All mail sent to his last known address has been returned as undeliverable. His telephone number is no longer in service. Inquiries to other members in the community have not disclosed his current whereabouts.

Pursuant to D.N.M.L.R.-Civ. 83.8(b), any objections to this Motion to Withdraw must be served and filed within fourteen (14) days of service of this Motion. A failure to object within this time period constitutes consent to the withdrawal of Tanya L. Scott and Law & Resource Planning Associates, P.C. from further representing Theodore Broderick.

Plaintiffs United States of America and State of New Mexico ex rel. State Engineer do not oppose this Motion.

WHEREFORE, Tanya L. Scott and Law & Resource Planning Associates, P.C.

respectfully request that the Court grant this Motion to Withdraw as Counsel of Record for Theodore Broderick in Subfile No. ZRB-4-0453.

Respectfully submitted,

LAW & RESOURCE PLANNING ASSOCIATES,
A Professional Corporation

By: _____

Charles T. DuMars
Tanya L. Scott
Attorneys at Law
Albuquerque Plaza, 201 3rd Street NW, Ste. 1750
Albuquerque, NM 87102

CERTIFICATE OF SERVICE

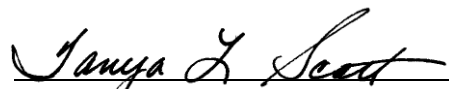
I hereby certify that on the 20th day of January 2016, I filed the foregoing Motion electronically through the CM/ECF system, which caused the following parties or counsel to be served by electronic means, as more fully reflected on the Notice of Electronic Filing:

Samuel D. Gollis
Andrew "Guss" Guarino
U.S. Department of Justice
South Terrace, Suite 370
999 Eighteenth St.
Denver, CO 80202
(303) 844-1359
Attorneys for the United States

Edward Bagley
Office of the State Engineer, Legal Division
P.O. Box 25102
Santa Fe, NM 87504
(505) 827-6150
Attorney for the New Mexico State Engineer

The Motion was also served by mail as follows:

Theodore Broderick
P.O. Box 319
Ramah, NM 87321

_____
Tanya L. Scott