

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW MEXICO

UNITED STATES OF AMERICA, )  
and )  
STATE OF NEW MEXICO, *ex rel.* STATE )  
ENGINEER, )  
                    Plaintiffs, )  
)  
and )  
ZUNI INDIAN TRIBE, AND )  
NAVAJO NATION, )  
                    Plaintiffs in Intervention )  
)  
vs. )  
)  
A. & R. PRODUCTIONS, *et. al.* )  
)  
                                    Defendants. )  
\_\_\_\_\_ )

01 CV-00072-BB-ACE

**ZUNI RIVER BASIN ADJUDICATION**

**MOTION FOR WITHDRAWAL AND SUBSTITUTION OF COUNSEL**

Defendant, Broe Land Acquisitions, III, LLC (“Broe”), by and through its current counsel of record, Sheehan, Sheehan & Stelzner, P.A. (John W. Utton) (the “Sheehan Firm”), hereby requests that this Court issue an order allowing the Sheehan Firm to withdraw as counsel of record for Broe, and substituting the law firm of Law & Resources Planning Associates, P.C. (Charles T. DuMars) as counsel of record for Broe.

A proposed order is submitted to the Court herewith (**Exhibit A**).

Respectfully submitted,

SHEEHAN, SHEEHAN & STELZNER, P.A.  
Attorneys for Broe Land Acquisitions III, LLC  
707 Broadway, N. E., Suite 300  
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(505) 247-0411

BY: /s/ John W. Utton  
JOHN W. UTTON

Approved:

LAW & RESOURCE PLANNING ASSOCIATES, P.C.

By: Electronically Approved on 12/07/07 by Tanya L. Scott

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Tanya L. Scott, Esq.  
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### CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 10th day of December, 2007, I filed the foregoing 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:

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**AND I FURTHER CERTIFY** that on such date I served the foregoing on the following non-CM/ECF Participants in the manner indicated:

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/s/ John W. Utton

JOHN W. UTTON

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW MEXICO

UNITED STATES OF AMERICA,	)	
and	)	
STATE OF NEW MEXICO, <i>ex rel.</i> STATE	)	
ENGINEER,	)	
Plaintiffs,	)	
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ZUNI INDIAN TRIBE, AND	)	
NAVAJO NATION,	)	<b>ZUNI RIVER BASIN ADJUDICATION</b>
Plaintiffs in Intervention	)	
	)	
vs.	)	
	)	
A. & R. PRODUCTIONS, <i>et. al.</i>	)	
	)	
Defendants.	)	
_____	)	

**ORDER ALLOWING WITHDRAWAL AND SUBSTITUTION OF COUNSEL**

The Motion of Defendant, Broe Land Acquisitions, III, LLC, to allow its current counsel of record, Sheehan, Sheehan & Stelzner, P.A. (John W. Utton), to withdraw, and to substitute the law firm of Law & Resource Planning Associates, P.C. (Charles T. DuMars) as its counsel of record, came before this Court. The Court, having reviewed the Motion, finds that it is well-taken and will be granted.

**IT IS HEREBY ORDERED, ADJUDGED AND DECREED THAT** the law firm of Sheehan, Sheehan & Stelzner, P.A.(John W. Utton) is hereby withdrawn as counsel of record for Defendant, Broe Land Acquisitions, III, LLC, and that the law firm of Law & Resources Planning Associates, P.C. (Charles T. DuMars) is substituted as counsel of record for Defendant, Broe Land Acquisitions, III, LLC.

**EXHIBIT A**

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**THE HONORABLE BRUCE BLACK**

**SUBMITTED BY:**

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**APPROVED BY:**

Approved on 12/07/07 by Tanya L. Scott  
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