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

UNITED STATES OF AMERICA and)
STATE OF NEW MEXICO ex rel,)
STATE ENGINEER,) No. 01cv00072-MV/WPI
)
Plaintiffs,) ZUNI RIVER BASIN
) ADJUDICATION
V.)
) Subfile No: ZRB 1-0077
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 Colin O'Neill in Subfile No. ZRB 1-0077.

As grounds for this Motion, LRPA states that it has lost all contact with Colin O'Neill. All mail sent to his last known address has not been returned. However, Mr. O'Neill has not responded to letters, his email address is no longer good, and his phone number has been disconnected.

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 Colin O'Neill.

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 Colin

O'Neill in Subfile No. ZRB 1-0077.

Respectfully submitted,

LAW & RESOURCE PLANNING ASSOCIATES,

A Professional Corporation

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 9th day of March 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:

Colin E. O'Neill 353 Baker Lane Erie, CO 80516

Tanya I Scott