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BEFORE THE ARIZONA CORPORATION COMMISSION

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COMMISSIONERS:

JEFF HATCH-MILLER, Chairman
WILLIAM A. MUNDELL
MARC SPITZER
MIKE GLEASON
KRISTIN K. MAYES

2006 MAR -2 P 4: 39
AZ CORP COMMISSION
DOCUMENT CONTROL

In the matter of:

Brixon Group Ltd.
1616 East Main, Suite 128
Mesa, Arizona 85203

Joseph Wayne McCool a.k.a. Joe McCool and
Jane Doe McCool, husband and wife
5306 East Boise Street or 5304 East Boise Street
Mesa, Arizona 85205

Donald John Manning a.k.a. Don Manning and
Jane Doe Manning, husband and wife
8260 East Keates Avenue, #502
Mesa, Arizona 85208

Cameron Guy Campbell and Nanette Campbell,
husband and wife
2375 Terraza Salvo
Carlsbad, CA 92009-6623

Respondents.

DOCKET NO. S-20402A-05-0569

**MOTION TO WITHDRAW AS
COUNSEL OF RECORD**

(Expedited Ruling Requested)

Pursuant to A.A.C. R14-3-104(E), undersigned counsel hereby moves to withdraw as local
counsel in this matter. This Motion is supported by the accompanying Memorandum of Points and
Authorities and the Certification of Paul J. Roshka, Jr. dated March 2, 2006.

RESPECTFULLY SUBMITTED this 2nd day of March, 2006.

ROSHKA DeWULF & PATTEN, PLC

By 

Paul J. Roshka, Jr., Esq.
One Arizona Center
400 East Van Buren Street, Suite 800
Phoenix, Arizona 85004
602-256-6100
Attorneys for Respondents
Cameron G. Campbell and Nanette Campbell

ROSHKA DEWULF & PATTEN, PLC
ONE ARIZONA CENTER
400 EAST VAN BUREN - SUITE 800
PHOENIX, ARIZONA 85004
TELEPHONE NO 602-256-6100
FACSIMILE 602-256-6800

MEMORANDUM OF POINTS AND AUTHORITIES

On August 23, 2005, undersigned counsel filed a Notice of Appearance of Local Counsel in this matter and notified the Commission that it would be serving as local counsel on behalf of Cameron G. Campbell and Nanette Campbell.

The undersigned identifies the Respondents' names, address, and telephone number as follows:

Cameron Guy Campbell and Nanette Campbell
husband and wife
2375 Terraza Salvo
Carlsbad, CA 92009-6623
(858) 459-4064
(760) 931-9213 – cell

Undersigned counsel finds it necessary to withdraw from further service as local counsel in this matter because continued representation by the undersigned and members of his firm will result in a violation of the Rules of Professional Conduct in violation of ER 1.16(b)(5). Further handling by new counsel is believed to be in the best interest of the clients.

Under the circumstances, undersigned are unable to continue serving as counsel. A copy of the Third Procedural Order, scheduling a pre-hearing conference in this matter on June 21, 2006, has been sent to Mr. and Mrs. Campbell. In addition, a copy of this Motion is being sent to Mr. and Mrs. Campbell to the addresses of the Respondents set forth above, and to the Division.

A proposed form of order is attached.

RESPECTFULLY SUBMITTED this 2nd day of March, 2006.

ROSHKA DeWULF & PATTEN, PLC

By 

Paul J. Roshka, Jr., Esq.
One Arizona Center
400 East Van Buren Street, Suite 800
Phoenix, Arizona 85004
602-256-6100
602-256-6800 (facsimile)
Attorneys for Respondents
Cameron G. Campbell and Nanette Campbell

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400 EAST VAN BUREN - SUITE 800
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TELEPHONE NO 602-256-6100
FACSIMILE 602-256-6800

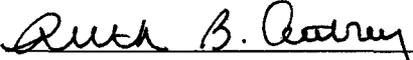
1 ORIGINAL and thirteen copies of the foregoing
hand-delivered this 2nd day of March, 2006 to:

2
3 Docket Control
4 Arizona Corporation Commission
1200 West Washington Street
Phoenix, Arizona 85007

5 COPY of the foregoing hand-delivered
this 2nd day of March, 2006 to:

6
7 Hearing Division
8 Arizona Corporation Commission
1200 West Washington Street
Phoenix, Arizona 85007

9 Matthew J. Neubert, Esq.
10 Director of Securities
11 Securities Division
12 Arizona Corporation Commission
13 1300 West Washington Street, 3rd Floor
Phoenix, Arizona 85007

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15 _____
16 CampbellC.ACC/pld/Motion to Withdraw.doc

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1 **BEFORE THE ARIZONA CORPORATION COMMISSION**

2 **COMMISSIONERS:**

3 **JEFF HATCH-MILLER, Chairman**
4 **WILLIAM A. MUNDELL**
5 **MARC SPITZER**
6 **MIKE GLEASON**
7 **KRISTIN K. MAYES**

8 In the matter of:

9 Brixon Group Ltd.
10 1616 East Main, Suite 128
11 Mesa, Arizona 85203

12 Joseph Wayne McCool a.k.a. Joe McCool and
13 Jane Doe McCool, husband and wife
14 5306 East Boise Street or 5304 East Boise Street
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16 Donald John Manning a.k.a. Don Manning and
17 Jane Doe Manning, husband and wife
18 8260 East Keates Avenue, #502
19 Mesa, Arizona 85208

20 Cameron Guy Campbell and Nanette Campbell,
21 husband and wife
22 2375 Terraza Salvo
23 Carlsbad, CA 92009-6623

24 Respondents.

DOCKET NO. S-20402A-05-0569

**CERTIFICATION OF PAUL J.
ROSHKA, JR. IN SUPPORT OF
MOTION TO WITHDRAW**

25 Pursuant to Rule 5.1(a)(2) Arizona Rules of Civil Procedure, and A.A.C. R14-3-104(E),
26 undersigned counsel hereby certifies that:

27 The clients have been informed of the status of the case.

A copy of the Third Procedural Order and the Motion to Withdraw as Counsel of Record
were sent to Mr. and Mrs. Campbell at the following address:

Cameron G. Campbell and Nanette Campbell
2375 Terraza Salvo
Carlsbad, CA 92009-6623



1 **BEFORE THE ARIZONA CORPORATION COMMISSION**

2 **COMMISSIONERS:**

3 **JEFF HATCH-MILLER, Chairman**
4 **WILLIAM A. MUNDELL**
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23 Carlsbad, CA 92009-6623

24 **Respondents.**

DOCKET NO. S-20402A-05-0569

ORDER RE: MOTION TO WITHDRAW

25 Based upon the Motion To Withdraw as Counsel of Record, and the Certification of Paul J.
26 Roshka, Jr., and good cause appearing, it is hereby ordered granting the Motion to Withdraw of
27 Paul J. Roshka Jr., James M. McGuire and the firm of Roshka DeWulf & Patten as local counsel in
this matter.

DATED this _____ day of _____, 2006.

MARC E. STERN
ADMINISTRATIVE LAW JUDGE