

ORIGINAL



BEFORE THE ARIZONA CORPORATION COMMISSION

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3 **COMMISSIONERS:** Arizona Corporation Commission
4 **MIKE GLEASON** – Chairman **DOCKETED**
5 **WILLIAM A. MUNDELL**
6 **JEFF HATCH-MILLER** AUG 10 2007
7 **KRISTIN K. MAYES**
8 **GARY PIERCE**

DOCKETED BY	YJK
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In the matter of:

Docket No. S-20472A-06-0535

9 THE 12 PERCENT FUND I, L.L.C. (a/k/a "THE
10 12% FUND," "12% FUND I" and "FUND"),
11 an Arizona limited liability company,
12 13714 Nightstar Court
13 Marana, Arizona 85653-4455;

14 COYOTE GROWTH MANAGEMENT, L.L.C.,
15 an Arizona limited liability company,
16 13714 Nightstar Court
17 Marana, Arizona 85653-4455;

18 MICHAEL JOSEPH HANNAN (a/k/a "MICHAEL
19 HANNAN," "MIKE HANNAN" and "MICHAEL J.
20 HANNAN, II") and JANE DOE HANNAN,
21 husband and wife,
22 13714 Nightstar Court
23 Marana, Arizona 85653-4455;

24 SAM AHDOOT (a/k/a "SAM AHDOOT") and
25 JANE DOE AHDOOT,
26 husband and wife,
27 5625 Crescent Park West, Apt. 130,
Playa Vista, California 90094-2083,

Respondents.

**APPLICATION TO WITHDRAW AS
COUNSEL FOR RESPONDENTS
THE 12 PERCENT FUND,
I, LLC, COYOTE GROWTH
MANAGEMENT, LLC, MICHAEL J.
HANNAN AND JANICE HANNAN**

AZ CORP COMMISSION
DOCKET CONTROL

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20 Pursuant to A.A.C. R14-3-104, the law firm of Roshka DeWulf & Patten, PLC ("Roshka
21 DeWulf & Patten") hereby moves to withdraw as counsel of record for Respondents The 12
22 Percent Fund I, LLC, Coyote Growth Management, LLC, Michael J. Hannan and Janice Hannan
23 (collectively, the "Hannan Respondents"), and requests that the Arizona Corporation Commission
24 remove Roshka DeWulf & Patten from any further mailings and communications in this matter.

25 ER 1.16(b) provides that counsel may withdraw if the client fails substantially to fulfill an
26 obligation to the lawyer regarding the lawyer's services and the client has been given reasonable
27 warning that the lawyer will withdraw unless the obligation is fulfilled. Here, the Respondents

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

1 have been unable to fulfill their obligation to the firm and have been notified that Roshka DeWulf
2 & Patten will withdraw unless those obligations were fulfilled.

3 On July 6, 2007, a Receiver for The 12% Fund and Coyote Growth Management LLC was
4 ordered by Judge Bethany G. Hicks. Counsel for these Respondents is Ryan W. Anderson, Esq.,
5 Guttilla Murphy Anderson, P.C., 4150 West Northern Avenue, Phoenix, Arizona 85051.

6 There are no pending deadlines and Roshka DeWulf & Patten has agreed to work
7 cooperatively with the Hannan Respondents to substitute other counsel in its place. The Hannan
8 Respondents have been advised of the Securities Division's Motion to Set Pre-Hearing Conference
9 to Discuss Request for Evidentiary Haring.

10 For future mailings, Roshka DeWulf & Patten requests that the Arizona Corporation
11 Commission forward communications for any of the Hannan Respondents to:

c/o Michael J. Hannan
13714 Nightstar Court
Marana, Arizona 85653-4455

14 For future mailings, Roshka DeWulf & Patten requests that the Arizona Corporation
15 Commission forward correspondence for the 12% Fund and Coyote Growth Management LLC to:

Ryan W. Anderson, Esq.
Guttilla Murphy Anderson, P.C.
4150 West Northern Avenue
Phoenix, Arizona 85051

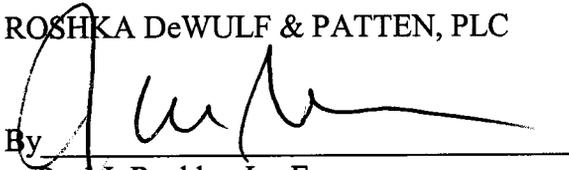
19 Based on the foregoing, Roshka DeWulf & Patten respectfully requests that it be permitted
20 to withdraw as counsel for the Respondents in the above-captioned matter.

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ONE ARIZONA CENTER
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FACSIMILE 602-256-6800

1 RESPECTFULLY SUBMITTED this 10th day of August, 2007.

2 ROSHKA DeWULF & PATTEN, PLC

3
4 By 

5 Paul J. Roshka, Jr., Esq.

6 One Arizona Center

7 400 East Van Buren Street, Suite 800

8 Phoenix, Arizona 85004

9 Attorneys for Respondents

10 The 12 Percent Fund, I, LLC, Coyote Growth

11 Management, LLC, Michael J. Hannan and

12 Janice Hannan

13 ORIGINAL and thirteen copies of the foregoing
14 filed this 10th day of August, 2007 with:

15 Docket Control

16 Arizona Corporation Commission

17 1200 West Washington Street

18 Phoenix, Arizona 85007

19 Copy of the foregoing hand-delivered
20 this 10th day of August, 2007 to:

21 Marc E. Stern

22 Administrative Law Judge

23 Hearing Division

24 Arizona Corporation Commission

25 1200 West Washington Street

26 Phoenix, Arizona 85007

27 Matthew J. Neubert, Director

Securities Division

Arizona Corporation Commission

1300 West Washington Street, 3rd Floor

Phoenix, Arizona 85007

Michael Dailey, Esq.

Securities Division

Arizona Corporation Commission

1300 West Washington Street, 3rd Floor

Phoenix, Arizona 85007

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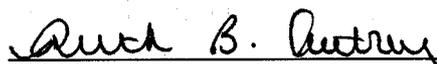
Copy of the foregoing mailed
this 10th day of August, 2007 to:

Michael J. and Janice Hannan
13714 Nightstar Court
Marana, Arizona 85653-4455

Roderick R. McBroom
P. O. Box 1931
Durango, Colorado 81302

Copy of the foregoing mailed and
faxed this 10th day of August, 2007 to:

Ryan W. Anderson, Esq.
Guttilla Murphy Anderson, P.C.
4150 West Northern Avenue
Phoenix, Arizona 85051


Hannan.ACC/pld/Application to Withdraw as Counsel.doc