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BEFORE THE ARIZONA CORPORATION COMMISSION

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COMMISSIONERS

MIKE GLEASON, Chariman
WILLIAM A. MUNDELL
JEFF HATCH-MILLER
KRISTIN K. MAYES
GARY PIERCE

2008 MAY 28 P 3:43

AZ CORP COMMISSION
DOCKET CONTROL

IN THE MATTER OF THE APPLICATION OF
BALTERRA SEWER CORP. FOR A
CERTIFICATE OF CONVENIENCE AND
NECESSITY TO PROVIDE WASTEWATER
SERVICE IN MARICOPA COUNTY, ARIZONA.

DOCKET NO. SW-20403A-05-0586

**MOTION FOR SUBSTITUTE
COUNSEL**

Balterra Sewer Corp. ("Balterra"), moves that the Commission, through its duly assigned Administrative Law Judge, issue a procedural order permitting the substitution of counsel in this matter. The current counsel of record ("Withdrawn Attorney") and proposed counsel ("Substituting Counsels") are:

Arizona Corporation Commission

DOCKETED

Current Counsel of Record MAY 28 2008

Proposed Counsel

Jay Shapiro
Fennemore Craig
3003 N. Central Ave., Suite 2600
Phoenix, Arizona 85012-2913
602.916.5366
602.916.5999 (fax)
jshapiro@fclaw.com

DOCKETED BY [Signature]

Michael W. Patten
Timothy J. Sabo
Roshka DeWulf & Patten, PLC
400 East Van Buren, Suite 800
Phoenix, Arizona 85004
602.256.6100
602.256.6800 (fax)
mpatten@rdp-law.com
tsabo@rdp-law.com

This motion is made pursuant to A.A.C. R14-3-104(E); Rule 5.1(a)(2) of the Arizona Rules of Civil Procedure; and ER 1.16(c) of Rule 42, Rules of the Supreme Court of Arizona. The Commission's rules allow the Administrative Law Judge to approve the withdrawal of any attorney "upon written application and good cause shown under such terms, conditions, and notices to clients and other parties as the Commission or presiding officer may direct." A.A.C. R14-3-104(E).

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 As the Commission is aware, Applicant recently became a subsidiary, ultimately, of Global
2 Water Resources, LLC ("Global Parent").

3 The Substituting Counsels are the usual and customary lawyers for Global Parent and its
4 regulated subsidiaries in matters concerning the Commission. The Substituting Counsels are
5 members in good standing with the State Bar of Arizona and are experienced in representing
6 parties before the Commission. Applicant has requested that Substituting Counsels represent them
7 in this matter. Accordingly, there is good cause for this motion.

8 Pursuant to Rule 5.1(a)(2)(A), Arizona Rules of Civil Procedure, attached is the written
9 approval of the client. (Exhibit A). Also pursuant to that rule, attached is a proposed order.
10 (Exhibit B).

11 Applicant requests that service upon the Applicant be made to:

12 Michael W. Patten
13 Timothy J. Sabo
14 Roshka DeWulf & Patten, PLC
15 400 East Van Buren, Suite 800
16 Phoenix, Arizona 85004
17 (602) 256-6100
18 (602) 256-6800 (fax)
19 mpatten@rdp-law.com
20 tsabo@rdp-law.com

21 With a copy to:

22 Mr. Graham Symmonds
23 Senior Vice President
24 Global Water Management
25 21410 North 19th Avenue, Suite 201
26 Phoenix, Arizona 85027.
27 (623) 580-9600

22 Accordingly, Applicant requests that the Commission, through its duly assigned
23 Administrative Law Judge, issue a procedural order: (1) granting this motion; (2) ordering that the
24 Substituting Counsels be considered Applicant's counsel of record in this matter; (3) ordering that
25 the service of all documents be made on Substituting Counsels, with a copy to the Applicant at the
26 address listed above; and (4) permitting Withdrawing Counsel to withdraw entirely from this
27 matter.

ROSHKA DEWULF & PATTEN, PLC
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RESPECTFULLY SUBMITTED this 28th day of May 2008.

ROSHKA DEWULF & PATTEN, PLC

By Timothy J. Sabo

Michael W. Patten
Timothy J. Sabo
One Arizona Center
400 East Van Buren Street, Suite 800
Phoenix, Arizona 85004

Original + 13 copies of the foregoing
filed this 28th day of May 2008, with:

Docket Control
Arizona Corporation Commission
1200 West Washington
Phoenix, Arizona 85007

Copies of the foregoing hand-delivered/mailed
this 28th day of May 2008, to:

Jay Shapiro, Esq.
Fennemore Craig
3003 N. Central Ave., Suite 2600
Phoenix, Arizona 85012-2913

Lyn A. Farmer, Esq.
Chief Administrative Law Judge
Hearing Division
Arizona Corporation Commission
1200 West Washington
Phoenix, Arizona 85007

Janice Alward, Esq.
Chief Counsel, Legal Division
Arizona Corporation Commission
1200 West Washington
Phoenix, Arizona 85007

Ernest G. Johnson, Esq.
Director, Utilities Division
Arizona Corporation Commission
1200 West Washington
Phoenix, Arizona 85007

By Debbie Amual

EXHIBIT

"A"

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AFFIDAVIT
Docket No. SW-20403A-05-0586

STATE OF ARIZONA)
) ss.
County of Maricopa)

I, having been duly sworn, Trevor T. Hill deposes and says:

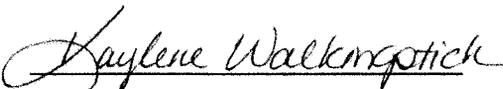
1. I am a resident of Maricopa County Arizona and I am over 18 years of age.
2. I am the President of Global Water Resources, LLC. I am also President of Balterra Sewer Corp. (Balterra)
3. I request that Michael W. Patten and Timothy J. Sabo of the Law Firm of Roshka DeWulf & Patten represent Balterra in Docket No. SW-20403A-05-0586 and all other matters before the Commission. Balterra consents to the filing of a Motion to Substitute Counsel in Docket No. SW-20403A-05-0586 and requests that the motion be granted.

Further affiant sayeth not.

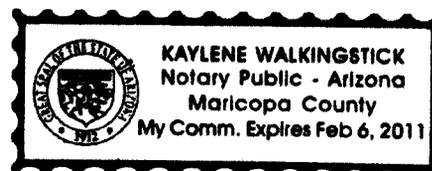


Trevor T. Hill

SUBSCRIBED AND SWORN to before me by Trevor T. Hill, this 28th day of
May, 2008.


Notary Public

My Commission Expires: February 6, 2011



EXHIBIT

"B"

1 **BEFORE THE ARIZONA CORPORATION COMMISSION**

2 **COMMISSIONERS**

3 MIKE GLEASON, Chariman

4 WILLIAM A. MUNDELL

5 JEFF HATCH-MILLER

6 KRISTIN K. MAYES

7 GARY PIERCE

8 IN THE MATTER OF THE APPLICATION OF
9 BALTERRA SEWER CORP. FOR A
10 CERTIFICATE OF CONVENIENCE AND
11 NECESSITY TO PROVIDE WASTEWATER
12 SERVICE IN MARICOPA COUNTY, ARIZONA.

DOCKET NO. SW-20403A-05-0586

**[PROPOSED] PROCEDURAL
ORDER**

13 On May ____, 2008, Balterra Sewer Corp. ("Applicant") filed a motion to substitute
14 counsel pursuant to A.A.C. R14-3-104(E); Rule 5.1(a)(2) of the Arizona Rules of Civil Procedure;
15 and ER 1.16(c) of Rule 42, Rules of the Supreme Court of Arizona. Attached to the motion was
16 an affidavit from the Applicant's President authorizing the motion. The current counsel of record
17 ("Withdrawing Counsel") is:

18 Jay Shapiro
19 Fennemore Craig
20 3003 N. Central Ave., Suite 2600
21 Phoenix, Arizona 85012-2913
22 (602) 916-5366
23 (602) 916-5999 (fax)
24 jshapiro@fclaw.com

25 The proposed counsel ("Substituting Counsels") is:

26 Michael W. Patten
27 Timothy J. Sabo
Roshka DeWulf & Patten, PLC
400 East Van Buren, Suite 800
Phoenix, Arizona 85004
(602) 256-6100
6(02) 256-6800 (fax)
mpatten@rdp-law.com
tsabo@rdp-law.com

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 Good cause having been shown, the motion should be granted.

2 IT IS THEREFORE ORDERED that Applicant's Motion to Substitute Counsel is granted.

3 IT IS FURTHER ORDERED that Substituting Counsels shall be considered Applicant's
4 counsel of record in this proceeding.

5 IT IS FURTHER ORDERED that service of all documents upon Applicant shall be made
6 to:

Michael W. Patten
Timothy J. Sabo
Roshka DeWulf & Patten, PLC
400 East Van Buren, Suite 800
Phoenix, Arizona 85004
(602) 256-6100
(602) 256-6800 (fax)
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11 With a copy to:

12 Mr. Graham Symmonds
13 Senior Vice President
14 Global Water Management
15 21410 North 19th Avenue, Suite 201
Phoenix, Arizona 85027.
(623) 580-9600

16 IT IS FURTHER ORDERED that Withdrawing Counsel is permitted to withdraw from this
17 matter entirely.

18 Dated this _____ day of _____, 2008

19

20

21

MARC E. STERN
ADMINISTRATIVE LAW JUDGE

22

23

24

25

26

27

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 Original and 13 copies of the foregoing
2 filed this ____ day of May 2008 with:

3 Docket Control
4 Arizona Corporation Commission
5 1200 West Washington Street
6 Phoenix, Arizona 85007

7 Copy of the foregoing hand-delivered/mailed
8 this ____ day of May 2008 to:

9 Jay Shapiro
10 Fennemore Craig
11 3003 N. Central Ave., Suite 2600
12 Phoenix, Arizona 85012-2913

13 Michael W. Patten, Esq.
14 Roshka DeWulf & Patten, PLC
15 One Arizona Center
16 400 East Van Buren, Suite 800
17 Phoenix, Arizona 85004

18 Lyn Farmer, Esq.
19 Chief Administrative Law Judge
20 Hearing Division
21 Arizona Corporation Commission
22 1200 West Washington
23 Phoenix, Arizona 85007

24 Janice Alward, Esq.
25 Chief Counsel, Legal Division
26 Arizona Corporation Commission
27 1200 West Washington
Phoenix, Arizona 85007

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