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Arizona Corporation Commission  
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ARIZONA CORPORATION COMMISSION  
DOCKET CONTROL

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**BEFORE THE ARIZONA CORPORATION COMMISSION**

In the matter of:

ROBERT PRESTON INGRAM and JANE  
DOE INGRAM, husband and wife,

Respondents.

DOCKET No.: S-20604A-08-0371

**APPLICATION TO WITHDRAW AS  
COUNSEL FOR RESPONDENTS  
ROBERT PRESTON INGRAM AND  
CRUZITA INGRAM**

Pursuant to A.A.C. R14-3-104, The Bentley Law Firm, P.C. ("Bentley") hereby moves to withdraw as counsel of record for Respondents Robert Preston Ingram and Cruzita Ingram (collectively "Respondents"), and requests that the Arizona Corporation Commission removes Bentley as attorney for Respondents Robert Preston Ingram and Cruzita Ingram, and from any further mailings and communications in this matter.

ER 1.16(b) provides that counsel may withdraw if the client fails substantially to fulfill an obligation to the lawyer regarding the lawyer's services and the client has been given reasonable warning that the lawyer will withdraw unless the obligation is fulfilled. Here, the Respondents have been unable to fulfill their financial obligation to the firm, have been notified that Bentley will withdraw unless those obligations were fulfilled. Respondents have agreed that Bentley may withdraw and that Respondents will obtain substitute legal counsel.

There is a pre-hearing conference scheduled for October 1, 2008 at 9:30 a.m. and Respondents are notified of the time and place.

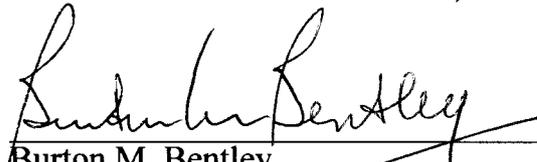
For future mailings, Bentley requests that the Arizona Corporation Commission forward communications for Respondents Robert Preston Ingram and Cruzita Ingram to:

1 Robert Preston Ingram  
2 Cruzita Ingram  
3 4040 East Mitchell Drive  
4 Phoenix, Arizona 85018

5 Based on the foregoing, Bentley respectfully requests that it be permitted to withdraw as  
6 counsel for the Respondents Robert Preston Ingram and Cruzita Ingram in the above-captioned  
7 matter.

8 RESPECTFULLY SUBMITTED this 15<sup>th</sup> day of September, 2008.

9 **THE BENTLEY LAW FIRM, P.C.**

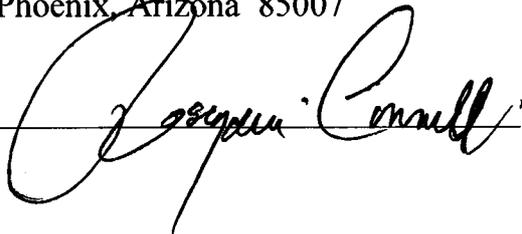
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11 \_\_\_\_\_  
12 Burton M. Bentley  
13 Attorney for Respondents

14 Original and thirteen (13) copies  
15 hand-delivered this 15<sup>th</sup> day of  
16 September, 2008, to:

17 Docket Control  
18 Arizona Corporation Commission  
19 1200 West Washington  
20 Phoenix, Arizona 85007

21 Copy of the foregoing hand-delivered  
22 this 15<sup>th</sup> day of September, 2008, to:

23 Mike Dailey  
24 Arizona Corporation Commission  
25 1300 West Washington, 3<sup>rd</sup> Floor  
26 Phoenix, Arizona 85007

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