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**GREENBERG TRAURIG, LLP**

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Arizona Corporation Commission

**DOCKETED**

FEB 10 2012

AZ CORP COMMISSION  
DOCKET CONTROL

DOCKETED BY

Brian J. Schulman, SBN 015286  
Attorneys for Respondents  
Maglev Wind Turbine Technologies, Inc.;  
Maglev Renewable Energy Resources, Inc.;  
Renewable Energy Development, Inc.;  
Renewable Energy Systems, Inc.;  
Edward L. Mazur; and Ronnie Williams

**BEFORE THE ARIZONA CORPORATION COMMISSION**

COMMISSIONERS

GARY PIERCE, Chairman  
BOB STUMP  
SANDRA D. KENNEDY  
PAUL NEWMAN  
BRENDA BURNS

In the matter of:

MAGLEV WIND TURBINE  
TECHNOLOGIES, INC., a Nevada  
corporation,  
  
MAGLEV RENEWABLE ENERGY  
RESOURCES, INC., a Wyoming corporation,  
  
RENEWABLE ENERGY DEVELOPMENT,  
INC., an Arizona corporation,  
  
RENEWABLE ENERGY SYSTEMS, INC.,  
an Arizona corporation  
  
EDWARD L. MAZUR and JANE DOE  
MAZUR, husband and wife,  
  
RONNIE WILLIAMS and JANE DOE  
WILLIAMS, husband and wife,  
  
MAG T INC, a Florida corporation,  
  
RLGMAN CORP, a Florida corporation,  
  
STABLE, LLC, an inactive Florida limited  
liability company,

DOCKET NO. S-20788A-11-0096

**MOTION TO WITHDRAW  
WITH CLIENTS' CONSENT**

**AND**

**MOTION TO CONTINUE**

1 RICHARD L. GREEN, respondent,  
2 DONALD ANDREW ROTHMAN, respondent  
3 Respondents.

4 Pursuant to A.A.C. R14-3-104(E) and Rule 1.16 of the Rules of Professional  
5 Conduct, attorney Brian J. Schulman and the law firm Greenberg Traurig, LLP  
6 (collectively "Greenberg Traurig") respectfully request (i) an order permitting their  
7 withdrawal as counsel of record for respondents Maglev Wind Turbine Technologies,  
8 Inc.; Maglev Renewable Energy Resources, Inc.; Renewable Energy Development, Inc.;  
9 Renewable Energy Systems, Inc.; Edward L. Mazur; and Ronnie Williams (collectively,  
10 the "Clients"); and (ii) a continuance of the deadline to exchange witness lists and  
11 exhibits, and the hearing. The reason for the request is that a conflict has developed  
12 between and among the Clients, and due to the nature of the conflict, Greenberg Traurig  
13 cannot continue to jointly represent them. The Clients have consented to this motion,  
14 and the Securities Division does not oppose the motion.

15 Pursuant to the Seventh Procedural Order, dated January 10, 2012, the hearing is  
16 set to begin on February 21, 2012, and the parties are to exchange witness lists and  
17 exhibits on this date, February 10, 2012. In light of the circumstances, on behalf of the  
18 Clients, Greenberg Traurig requests a continuance of the deadline to exchange witness  
19 lists and exhibits, and also of the hearing date. Greenberg Traurig respectfully requests  
20 that a status conference be set to allow the Clients sufficient time to engage new  
21 counsel, who can then participate in the rescheduling of the pre-hearing deadlines and  
22 the new hearing date.

23 Undersigned counsel certifies the Clients have been notified in writing of the  
24 status of this matter, including the dates and times of any hearings.

25 ///

26 ///

LAW OFFICES  
**GREENBERG TRAURIG**  
2375 EAST CAMELBACK ROAD, SUITE 700  
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(602) 445-8000

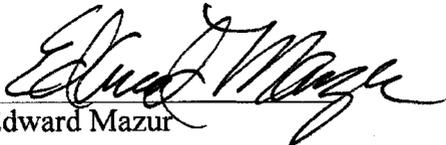
1 The corporate Clients can be reached care of Messrs. Mazur and Williams, whose  
2 contact information is below:

3 Edward Mazur  
4 6304 S. De Mello Street  
5 Hereford, AZ 85615-5602  
6 Phone: (520)-226-7442  
7 emaz7@cox.net

8 Ron Williams  
9 2160 E. Fry Blvd., Suite 283  
10 Sierra Vista, AZ 85635  
11 Office: (520) 226-4452  
12 Cell: (520) 456-7561  
13 rwilliams@regenedyne.com

14 **CONSENT OF EDWARD MAZUR**

15 Edward Mazur, on behalf of himself and the corporate Clients, consents to the  
16 withdrawal of Greenberg Traurig, LLP as counsel of record in the above-captioned  
17 matter.

18   
Edward Mazur

19 **CONSENT OF RON WILLIAMS**

20 Ron Williams, on behalf of himself and the corporate Clients, consents to the  
21 withdrawal of Greenberg Traurig, LLP as counsel of record in the above-captioned  
22 matter.

23 \_\_\_\_\_  
24 Ron Williams

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The corporate Clients can be reached care of Messrs. Mazur and Williams, whose contact information is below:

Edward Mazur  
6304 S. De Mello Street  
Hereford, AZ 85615-5602  
Phone: (520)-226-7442  
emaz7@cox.net

Ron Williams  
2160 E. Fry Blvd., Suite 283  
Sierra Vista, AZ 85635  
Office: (520) 226-4452  
Cell: (520) 456-7561  
rwilliams@regenedyne.com

**CONSENT OF EDWARD MAZUR**

Edward Mazur, on behalf of himself and the corporate Clients, consents to the withdrawal of Greenberg Traurig, LLP as counsel of record in the above-captioned matter.

\_\_\_\_\_  
Edward Mazur

**CONSENT OF RON WILLIAMS**

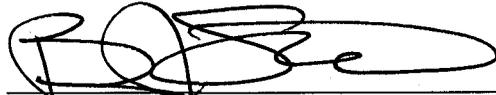
Ron Williams, on behalf of himself and the corporate Clients, consents to the withdrawal of Greenberg Traurig, LLP as counsel of record in the above-captioned matter.

  
\_\_\_\_\_  
Ron Williams

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PHOENIX, ARIZONA 85016  
(602) 445-8000

1 DATED this 10<sup>th</sup> day of February 2012.

2 GREENBERG TRAUIG, LLP

3  
4  
5 By: 

6 BRIAN J. SCHULMAN  
7 Attorneys for the Respondents  
8 Maglev Wind Turbine Technologies, Inc.;  
9 Renewable Energy Resources, Inc.;  
10 Renewable Energy Development, Inc.;  
11 Renewable Energy Systems, Inc.;  
12 Edward L. Mazur; and Ronnie Williams

13 ORIGINAL and 13 copies of  
14 the foregoing hand-delivered on this  
15 10<sup>th</sup> day of February 2012 to:

16 Docket Control  
17 Arizona Corporation Commission  
18 1200 W. Washington Street, First Floor  
19 Phoenix, AZ 85007

20 COPY of the foregoing emailed/mailed  
21 on this 10<sup>th</sup> day of February 2012 to:

22 Matthew J. Neubert (mneubert@azcc.gov)  
23 Julie Coleman (jcoleman@azcc.gov)  
24 Arizona Corporation Commission  
25 Securities Division  
26 1300 W. Washington Street  
27 Phoenix, AZ 85007

28 Douglas F. Behm (dbehm@behmlawfirm.com)  
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