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**BEFORE THE ARIZONA CORPORATION COMMISSION**

AZ CORP COMMISSION  
DOCKET CONTROL

Arizona Corporation Commission

**DOCKETED**

NOV 01 2013

DOCKETED BY

**COMMISSIONERS**

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

In the Matter of:

TRI-CORE COMPANIES, LLC, an  
Arizona limited liability company,

TRI-CORE MEXICO LAND  
DEVELOPMENT, LLC, an Arizona  
limited liability company,

TRI-CORE BUSINESS DEVELOPMENT,  
LLC, an Arizona limited liability company,

ERC COMPACTORS, LLC, an Arizona  
limited liability company,

ERC INVESTMENTS, LLC, an Arizona  
limited liability company,

C&D CONSTRUCTION SERVICES,  
INC., a Nevada corporation,

PANGAEA INVESTMENT GROUP,  
LLC, an Arizona limited liability company,  
d/b/a Arizona Investment Center,

JASON TODD MOGLER, an Arizona  
resident,

BRIAN N. BUCKLEY and CHERYL  
BARRETT BUCKLEY, husband and wife,

CASIMER POLANCHEK, an Arizona  
resident,

NICOLE KORDOSKY, an Arizona  
resident,

Respondents.

Docket No. S-20867A-12-0459

**MOTION TO WITHDRAW AS  
COUNSEL OF RECORD FOR  
RESPONDENTS: (1) ERC  
COMPACTORS, LLC; AND (2) ERC  
INVESTMENTS, LLC**

(Assigned to Administrative Law Judge  
Marc E. Stern)

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Docket No. S-20867A-12-0459

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2 Bobby O. Thrasher, Jr., Esq. of THRASHER JEMSEK PLLC respectfully requests  
3 entry of an order permitting him to withdraw as counsel of record for Respondents: (1)  
4 ERC Compactors, LLC; and (2) ERC Investments, LLC. For reasons stated on the record in  
5 the hearing of this matter on October 23, 2013, undersigned counsel requests to be  
6 withdrawn as counsel of record. The above entities are currently under the control and  
7 ownership of ERC of Chicago, LLC an Illinois limited liability company. ERC of Chicago,  
8 LLC is managed by Guy Quinn Jr. Contact information for ERC of Chicago, LLC and Mr.  
9 Quinn is as follows: 625-D Railroad Street, Montgomery, Illinois 60538, 708-937-3688.

10 Mr. Quinn has expressed his intent to retain counsel to represent these two entities  
11 going forward in this matter. The hearing in this matter recessed on October 23, 2013, to  
12 permit the parties to address this issue and time for Mr. Quinn to engage counsel to appear  
13 on behalf of ERC Compactors, LLC and ERC Investments, LLC at the hearing scheduled to  
14 resume on February 3, 2014.

15 For the foregoing reasons, undersigned counsel respectfully requests that he be  
16 permitted to withdraw as counsel for ERC Compactors, LLC and ERC Investments, LLC.

17 Dated this 31<sup>st</sup> day of October, 2013.

18 **THRASHER JEMSEK, PLLC**

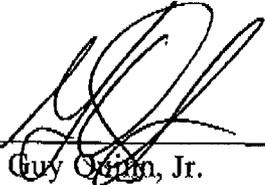
19  
20  
21 By 

22 Bobby O. Thrasher, Jr.  
23 530 East McDowell Road, Unit No. 107-495  
24 Phoenix, Arizona 85004  
25 *Attorney for Respondents*  
26  
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Docket No. S-20867A-12-0459

**CONSENT**

1 I, Guy Quinn, Jr., the manager of ERC Compactors, LLC and ERC Investments, LLC  
2 hereby consent to the withdrawal of Bobby O. Thrasher, Jr., Esq. of THRASHER JEMSEK  
3 PLLC as attorney of record in this matter.

4  
5 By   
6 Guy Quinn, Jr.  
7 Manager of ERC Compactors, LLC and ERC  
8 Investments, LLC

9 ORIGINAL AND 13 COPIES of the foregoing filed <sup>November</sup> ~~October~~ 7, 2013, with:

10 Docket Control  
11 Arizona Corporation Commission  
12 1200 West Washington Street  
13 Phoenix, Arizona 85007

14 COPIES of the foregoing mailed <sup>November</sup> ~~October~~ 7, 2013, to:

15 Honorable Marc E. Stern  
16 Administrative Law Judge  
17 Arizona Corporation Commission / Hearing Division  
18 1200 West Washington Street  
19 Phoenix, Arizona 85007

20 Stacey L. Luedtke  
21 Staff Attorney  
22 Arizona Corporation Commission  
23 Securities Division  
24 1300 W. Washington, 3<sup>rd</sup> Floor  
25 Phoenix, Arizona 85007

26 Dale B. Rycraft, Jr., Esq.  
27 The Rycraft Law Firm, PLLC  
28 2929 North Power Road, Suite 101  
Mesa, Arizona 85215  
*Attorney for C&D Construction*

Docket No. S-20867A-12-0459

1 Nicole Kordosky  
2 1075 North Miller Road, #149  
3 Scottsdale, Arizona 85257  
4 *Respondent*

5 ERC of Chicago, LLC  
6 Attn: Guy Quinn, Jr.  
7 625-D Railroad Street  
8 Montgomery, Illinois 60538

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