



0000157654

RECEIVED

2014 NOV -3 P 1:53

ARIZONA CORP COMMISSION
DOCKET CONTROL

1 FENNEMORE CRAIG
2 A Professional Corporation
3 Jay L. Shapiro (No. 014650)
4 2394 E. Camelback Road, Suite 600
5 Phoenix, Arizona 85016

6 Attorney for Payson Water Co., Inc.

ORIGINAL

BEFORE THE ARIZONA CORPORATION COMMISSION

7 J. ALAN SMITH,
8 COMPLAINANT,
9 VS.
10 PAYSON WATER CO., INC. / BROOKE
11 UTILITIES, INC.,
12 RESPONDENT.

DOCKET NO: W-03514A-12-0007

MOTION TO WITHDRAW AS
COUNSEL FOR PAYSON WATER
CO., INC.

12 Jay L. Shapiro and the law firm of Fennemore Craig, P.C. hereby move for leave to
13 withdraw as counsel of record for Payson Water Co., Inc. ("PWC" or the "Company")
14 in accordance with A.A.C. R14-3-104(E) and Rule 1.16 of the Rules of Professional
15 Responsibility. The reason for this motion is that the Company is unable to pay
16 Fennemore Craig for legal services and costs advanced in connection with this matter.
17 The Company has consented to Fennemore Craig's withdrawal. Approval of this motion
18 is set forth below.

19 The contact information for PWC is:

20 Jason Williamson, President
21 Payson Water Co., Inc.
22 7581 E. Academy Boulevard, Suite 229
23 Denver, CO 80230
24 Telephone: (720) 949-1384
25 E-mail: jw@pivotalcompanies.com

Arizona Corporation Commission

DOCKETED

NOV 3 2014

DOCKETED BY

26 PWC respectfully requests the ALJ issue an order that (1) permits Jay L. Shapiro
and the law firm of Fennemore Craig to withdraw as counsel of record for PWC;

1 (2) immediately relieves Jay L. Shapiro and the law firm of Fennemore Craig of all duties
2 as counsel of record for PWC; and (3) requires that all further Orders, notices, or other
3 documents entered in this matter shall be served upon Jason Williamson at the above
4 address.

5 RESPECTFULLY SUBMITTED this 3rd day of November, 2014.

6 FENNEMORE CRAIG, P.C.

7
8 By _____

Jay L. Shapiro
2394 E. Camelback Road, Suite 600
Phoenix, Arizona 85016
Attorneys for Payson Water Co., Inc.

9
10
11
12
13 ORIGINAL and thirteen (13) copies of the
14 foregoing, were filed
this 3rd day of November, 2014, to:

15 Docket Control
16 Arizona Corporation Commission
1200 W. Washington St.
17 Phoenix, AZ 85007

18 COPY hand-delivered
this 3rd day of November, 2014 to:

19 Dwight D. Nodes
20 Assistant Chief Administrative Law Judge
Arizona Corporation Commission
1200 W. Washington St.
21 Phoenix, AZ 85007

22 Robin Mitchell
23 Brian Smith
24 Legal Division
Arizona Corporation Commission
1200 W. Washington St.
25 Phoenix, AZ 85007

26

1 COPY mailed
2 this 3rd day of November, 2014 to:

3 J. Alan Smith
4 600 S. Oak Street, Space 4
5 Payson, Arizona 85541

6 Jim Pearson
7 Pearson Transport/Pearson Water
8 P.O. Box 193
9 1120 Rodeo Road
10 Williams, Arizona 86046

11 By: 

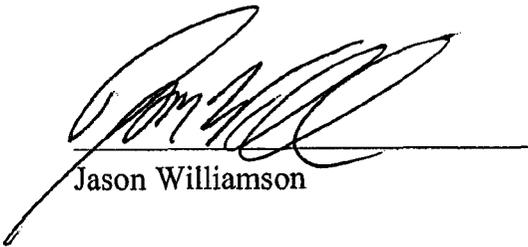
12 9679439.1/073283.0008

13
14
15
16
17
18
19
20
21
22
23
24
25
26

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26

**CONSENT TO
FENNEMORE CRAIG, P.C.'S
WITHDRAWAL AS COUNSEL IN THIS MATTER**

On behalf of Payson Water Co., Inc., I consent to the withdrawal of Jay L. Shapiro and the law firm of Fennemore Craig as counsel of record in J. Alan Smith vs. Payson Water Co., Inc. / Brooke Utilities, Inc., Docket No. W-03514A-12-0007. The Company is unable to pay for these legal services at this time, and has authorized me to appear on behalf of the Company.


Jason Williamson