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AZ CORP COMMISSION
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1 Robert D. Mitchell, 011922
 2 Sarah K. Deutsch, 026229
 3 **TB** TIFFANY & BOSCO
P.A.
 4 Camelback Esplanade II, Seventh Floor
 5 2525 East Camelback Road
 6 Phoenix, Arizona 85016-4229
 7 Telephone (602) 255-6000
 8 Fax (602) 255-0103
 9 E-mails: rdm@tblaw.com; skd@tblaw.com

7 Counsel for Respondent
 8 Robert J. Kerrigan

BEFORE THE ARIZONA CORPORATION COMMISSION

12 In the matter of:
 13 USA BARCELONA REALTY ADVISORS,
 14 LLC, an Arizona limited liability company,
 15 USA BARCELONA HOTEL LAND
 16 COMPANY I, LLC, an Arizona limited
 17 liability company,
 18 RICHARD C. HARKINS, an unmarried man,
 19 ROBERT J. KERRIGAN (CRD no. 268516),
 20 an unmarried man,
 21 GEORGE T. SIMMONS and JANET B.
 22 SIMMONS, husband and wife,
 23 BRUCE L. ORR and SUSAN S. ORR,
 24 husband and wife,

Respondents.

Docket No. S-20938A-15-0308

**MOTION TO WITHDRAW AS
COUNSEL FOR RESPONDENT
ROBERT J. KERRIGAN**

Arizona Corporation Commission

DOCKETED

MAR 21 2016

DOCKETED BY	<i>[Signature]</i>
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Pursuant to Ariz. R. Civ. P. 5.1, attorneys Robert D. Mitchell and Sarah K. Deutsch and the law firm of Tiffany & Bosco, P.A. hereby move to withdraw as counsel of record for Respondent Robert J. Kerrigan. Respondent Robert J. Kerrigan has failed to comply with his financial commitments to counsel and therefore good cause exists for counsel to be permitted to withdraw.

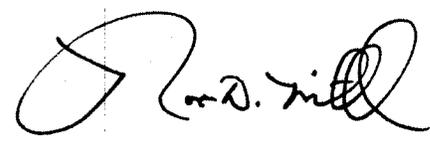
Respondent Robert J. Kerrigan has been advised of the scheduled hearing dates. Respondent Robert J. Kerrigan's contact information is as follows:

Robert J. Kerrigan
8062 East Del Tornasol Drive
Scottsdale, AZ 85258-1748
Telephone: (480) 636-8697
E-mail: robertk37@cox.net

A proposed form of order is submitted herewith.

DATED this 21st day of March, 2016.

TIFFANY & BOSCO, P.A.



By _____
Robert D. Mitchell, 011922
Sarah K. Deutsch, 026229
Camelback Esplanade II, Seventh Floor
2525 East Camelback Road
Phoenix, Arizona 85016-4229
Counsel for Respondent Robert J. Kerrigan

1 ORIGINAL plus 10 COPIES of the foregoing
2 filed on this 21st day of March, 2016 with:

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

7 COPIES of the foregoing mailed
8 on this 21st day of March, 2016 to:

9 The Honorable Mark Preny
10 Administrative Law Judge
11 Hearing Division
12 Arizona Corporation Commission
13 1200 West Washington Street
14 Phoenix, Arizona 85007

15 Paul S. Kitchin, Esq.
16 Securities Division
17 Arizona Corporation Commission
18 1300 West Washington Street, Third Floor
19 Phoenix, Arizona 85007-2996

20 Charles R. Berry, Esq.
21 Stanley R. Foreman, Esq.
22 Clark Hill PLC
23 14850 North Scottsdale Road, Suite 500
24 Scottsdale, Arizona 85254

25 USA Barcelona Realty Advisors, LLC
26 c/o Richard C. Harkins
27 4422 East Lupine Avenue
28 Phoenix, Arizona 85028-2321

USA Barcelona Hotel Land Company I, LLC
c/o Richard C. Harkins
4422 East Lupine Avenue
Phoenix, Arizona 85028-2321

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Phoenix, Arizona 85028-2321

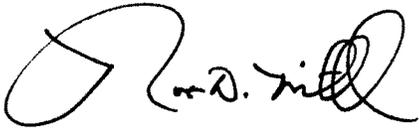
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Bruce Orr
3757 Falcon Avenue
Long Beach, California 90807-4219

Susan S. Orr
3757 Falcon Avenue
Long Beach, California 90807-4219

Robert J. Kerrigan
8062 East Del Tornasol Drive
Scottsdale, AZ 85258-1748



kerrigan/pldgs/mot to withdraw as counsel

EXHIBIT 1

1 Robert D. Mitchell, 011922
2 Sarah K. Deutsch, 026229
3 **TB** TIFFANY & BOSCO
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4 Camelback Esplanade II, Seventh Floor
5 2525 East Camelback Road
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7 Telephone (602) 255-6000
8 Fax (602) 255-0103
9 E-mails: rdm@tblaw.com; skd@tblaw.com

7 Counsel for Respondent
8 Robert J. Kerrigan

10 **BEFORE THE ARIZONA CORPORATION COMMISSION**

11
12 In the matter of:
13 USA BARCELONA REALTY ADVISORS,
14 LLC, an Arizona limited liability company,
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16 COMPANY I, LLC, an Arizona limited
17 liability company,
18 RICHARD C. HARKINS, an unmarried man,
19 ROBERT J. KERRIGAN (CRD no. 268516),
20 an unmarried man,
21 GEORGE T. SIMMONS and JANET B.
22 SIMMONS, husband and wife,
23 BRUCE L. ORR and SUSAN S. ORR,
24 husband and wife,
25 Respondents.

Docket No. S-20938A-15-0308

**ORDER GRANTING
MOTION TO WITHDRAW AS
COUNSEL FOR RESPONDENT
ROBERT J. KERRIGAN**

25 Pursuant to the Motion to Withdraw as Counsel for Respondent Robert J. Kerrigan
26 submitted pursuant to Ariz. R. Civ. P. 5.1, and good cause appearing therefore,
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IT IS HEREBY ORDERED that attorneys Robert D. Mitchell and Sarah K. Deutsch and the law firm of Tiffany & Bosco, P.A. are hereby withdrawn as counsel of record for Respondent Robert J. Kerrigan in the above-captioned matter.

DATED this ____ day of _____, 2016.

The Honorable Mark Preny
Administrative Law Judge
Hearing Division
Arizona Corporation Commission