GEORGE M. KEELE, ESQ.
Nevada Bar No. 1701
GEORGE M. KEELE, A P.C.
1692 County Road, Ste. A-2
Minden, NV 89423
Phone: 775-782-9781
Email: marybaldecchi@aol.com

IN THE UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

UNITED STATES OF AMERICA, Plaintiff, WALKER RIVER PAIUTE TRIBE, Plaintiff-Intervenor, v. WALKER RIVER IRRIGATION DISTRICT, a corporation, et al., Defendants.	3:73-cv-00127-ECR-RAM IN EQUITY NO. C-125-RCJ Subproceeding: C-125-B **MOTION FOR WITHDRAWAL AS COUNSEL FOR LeROY JAMES PERRY TRUST**

PLEASE TAKE NOTICE that LeRoy James Perry Trust, by and through its attorneys, GEORGE M. KEELE, ESQ., of GEORGE M. KEELE, A PROFESSIONAL CORPORATION, hereby moves this Court for an order of withdrawal of counsel for LeRoy James Perry Trust in the above-captioned matter. This motion is made and based upon the Memorandum of Points and Authorities

George M. Keele, Esq.
1692 County Road, #A
Minden, Nevada 89423
Phone: 775-782-9781
Fax: 775-782-2970

submitted herein and the Affidavit of George M. Keele filed concurrently herewith.

MEMORANDUM OF POINTS AND AUTHORITIES

LeRoy James Perry Trust brings this motion to proceed as an "unrepresented party" in this matter. This motion is brought pursuant to LR IA 11-6, and is supported by the Affidavit of George M. Keele filed in conjunction herewith.

Local Rule IA 11-6(b) provides that "[n]o attorney may withdraw after appearing in a case except by leave of the court after notice has been served on the affected client and opposing counsel." George M. Keele has corresponded with LeRoy James Perry Trust as to this withdrawal, and he will provide a copy of the instant motion to LeRoy James Perry Trust. Further, all other counsel and parties in this case will receive notice of this motion as described in the certificate of service attached hereto.

Local Rule IA 11-6(e) further states "no withdrawal or substitution will be approved if it will result in delay of discovery, the trial, or any hearing in the case." No delay of any kind will result from the withdrawal of George M. Keele, Esq., as attorney for LeRoy James Perry Trust, as LeRoy James Perry Trust will continue to participate as an "Unrepresented Party" as defined in this Court's March 8,

George M. Keele, Esq.
1692 County Road, #A
Minden, Nevada 89423
Phone: 775-782-9781
Fax: 775-782-2970

2019, *Order Discontinuing Service by Postcard Notice* (ECF No. 2439).

LeRoy James Perry Trust has provided the following contact information to continue as an Unrepresented Party, and requests addition to the electronic service list to receive service of documents at the following address:

jimp37321@gmail.com
LeRoy James Perry, Trustee
P.O. Box 242
Minden, NV 89423

CONCLUSION

For the reasons set forth above, George M. Keele, of George M. Keele, A Professional Corporation, hereby requests an order from the Court to withdraw as counsel for LeRoy James Perry Trust. A Proposed Order is attached hereto as Exhibit 1.

Dated: December 23, 2019.

GEORGE M. KEELE,
A Professional Corporation

By: _____
GEORGE M. KEELE, ESQ.
Nevada Bar No. 4804
Attorney for LeRoy James Perry Trust

///

///

George M. Keele, Esq.
1692 County Road, #A
Minden, Nevada 89423
Phone: 775-782-9781
Fax: 775-782-2970

CERTIFICATE OF SERVICE

I certify that I am an employee of George M. Keele, A Professional Corporation, and that on the 27th day of December, 2019, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the parties of record.

I further certify that I placed in the U.S. Mail a copy of the foregoing, postage paid, addressed to:

James Perry
P.O. Box 242
Minden, NV 89423

Mary E. Baldecchi

Mary E. Baldecchi

George M. Keele, Esq.
1692 County Road, #A
Minden, Nevada 89423
Phone: 775-782-9781
Fax: 775-782-2970