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8 Attorneys for the Defendants
9

7 UNITED STATES DISTRICT COURT
8 DISTRICT OF NEVADA
9

10 UNITED STATES OF AMERICA

11 Plaintiff,

12 THE WALKER RIVER PAIUTE TRIBE,

13 Plaintiff-Intervenor,

14 v.

15 THE WALKER RIVER IRRIGATION
16 DISTRICT, a corporation, et al.,

17 Defendants.

18 UNITED STATES OF AMERICA,
19 WALKER RIVER PAIUTE TRIBE,

20 Counterclaimants

21 v.

22 WALKER RIVER IRRIGATION
23 DISTRICT, et al.,

24 Counterdefendants.

25 STATE OF OREGON)
26 County of Multnomah) SS.
)

IN EQUITY NO. C-125-B-ECR
3:73-cv-00127-ECR-LRL

**AFFIDAVIT OF LAURA A.
SCHROEDER IN SUPPORT OF
MOTION TO WITHDRAW AS
COUNSEL**

I, LAURA A. SCHROEDER, being first duly sworn, depose and say:



1 1. I am the attorney of record for Borsini Ranch, Inc. ("Borsini Ranch"), in the
2 above matter. I have personal knowledge of the facts set forth herein, am over the age of 18
3 years and am otherwise competent to make this affidavit.

4 2. I make this affidavit in support of my second motion to withdraw as counsel.

5 3. Borsini Ranch is a registered business located in Yerington, NV.

6 4. In 2004, Schroeder Law Offices, P.C. ("Schroeder") filed an Objection to Petition
7 for Temporary Change in Place of Use and Notice of Party Status on behalf of Borsini Ranch in
8 Case 125.

9 5. On September 22, 2004, Schroeder filed a Notice of Appearance and Intent to
10 Participate on behalf of Borsini Ranch in Case 125, subfile B.

11 6. Throughout its representation of Borsini Ranch, Schroeder copied Borsini Ranch
12 on all documents related to Case 125 and Case 125, subfile B.

13 7. In the end of July 2008, we learned that Borsini Ranch desired to leave the group,
14 collectively and commonly known as the Circle Bar N Ranch Group in these proceedings. In
15 addition, we learned that Borsini Ranch no longer wanted the legal services of Schroeder Law
16 Offices, P.C.

17 8. By letter dated August 8, 2008, we provided notice to Borsini Ranch's
18 representative, Dave Dale Borsini, that Schroeder Law Office would move to withdraw from the
19 company's representation. We received no response from Borsini Ranch indicating that
20 termination of representation was opposed.

21 9. Pursuant to a minute order dated September 16, 2008, this Court denied our
22 motion to withdraw, stating that withdrawal could not be allowed absent a substitute attorney to
23 represent Borsini Ranch, a corporate defendant (Docket #1426).

24 10. By letter dated September 18, 2008, Schroeder sent a request to Borsini Ranch to
25 identify an alternate attorney to substitute in Schroeder's place.

26 ///



1 11. Schroeder Law Office has since provided Borsini Ranch ample time (nine
2 months) to substitute counsel.

3 12. David Dale Borsini, representative of Borsini Ranch, has directed this office to
4 inform the Court of its demand “that Borsini Ranch, Inc. be removed immediately from any
5 further litigation involving [Schroeder] services” and further that Borsini Ranch “will not be
6 retaining a substitute attorney, as [Borsini Ranch] never retained your services originally.”

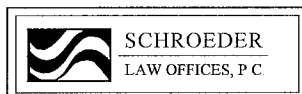
7 13. Schroeder disputes that Borsini Ranch never retained Schroeder’s services.
8 Borsini Ranch’s September 22, 2004 Notice of Appearance and Intent to Participate designates
9 Laura A. Schroeder as Borsini’s counsel.

10 14. By letter dated, April 21, 2008, Schroeder informed Borsini Ranch that it would
11 again move to withdraw from representing Borsini Ranch. We received no objection or response
12 from Borsini Ranch.

13 15. By letter dated June 5, 2009, we informed all opposing counsel that we would
14 again be moving to withdraw from representation of Borsini Ranch. We received no response
15 objecting to our proposed motion.

16 16. As of the date of this filing, I believe withdrawal is mandatory and will provide
17 additional information under cover of seal if proper and necessary.

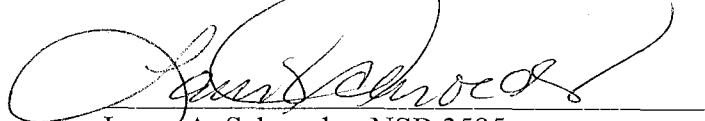
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1 17. As of the date of this filing, Schroeder is unwilling to continue representation of
2 Borsini Ranch.

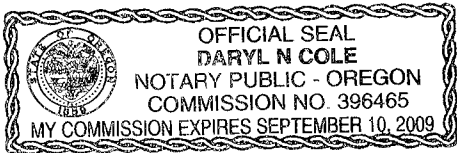
3 DATED this 17th day of July, 2009.

4 SCHROEDER LAW OFFICES, P.C.

5 

6 Laura A. Schroeder, NSB 3595
7 Attorney for Respondent

8 SUBSCRIBED AND SWORN to before me by Laura A. Schroeder this 17th day of July, 2009.



10 

11 Notary Public for Oregon
12 My commission expires: September 10 2009

