

1 LAURA A. SCHROEDER, NSB #3595
2 WYATT E. ROLFE, NSB #10735
3 Schroeder Law Offices, P.C.
4 PO Box 40400 440 Marsh Avenue
5 Reno, NV 89504-4400 Reno, NV 89509
6 PHONE (775) 786-8800; FAX (877) 600-4971
7 counsel@water-law.com
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.

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

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**

**(Peri & Sons Farms, Inc.; Desert Pearl
Farms; David J. and Pamela A. Peri Family
Trust)**



1 1. I am the attorney of record for Peri Brothers & Sons in Case 125 and Peri & Sons
2 Farms, Inc., Desert Pearl Farms, and the David J. & Pamela A. Peri Family Trust in Case 125,
3 subfile B (collectively "Peri entities"). I have personal knowledge of the facts set forth herein,
4 am over the age of 18 years and am otherwise competent to make this affidavit.

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

6 3. In March 2004 Schroeder Law Offices P.C. ("Schroeder") filed an Objection to
7 Petition for Temporary Change in Place of Use and Manner of Use (Docket #655) and Notice of
8 Party Type on behalf of "Peri Brothers & Sons," in Case 125 (Docket #647).

9 4. On September 22, 2004 Schroeder filed a Notice of Appearance and Intent to
10 Participate on behalf of Peri & Sons Farms, Inc., Desert Pearl Farms, and David J. & Pamela A.
11 Peri Family Trust, in Case 125, subfile B.

12 5. From September 22, 2004 forward, Schroeder has appeared on behalf of the Peri
13 entities. Schroeder copied the Peri entities on all documents related to Case 125 and Case 125,
14 subfile B.

15 6. The circumstances of Schroeder's representation of the Peri entities have changed
16 to create a situation for which withdrawal is appropriate. Our office will submit additional
17 information under seal if the Court so desires.

18 7. We have provided the Peri entities ample notice and opportunity to substitute
19 counsel, including via written correspondence on March 18, 2009, June 12, 2009, and July 31,
20 2009. We received no objection from any Peri entity regarding our withdrawal. To date, the
21 Peri entities have not provided substitute counsel.

22 8. This office has advised the Peri entities that if our motions to withdraw are
23 granted, the Peri entities will be precluded from acting or participating in the Walker River
24 litigation until such time as a substitute attorney is provided.

25 9. This office has advised the Peri entities that if our motions to withdraw are
26 granted, the Peri entities risk action to seek default judgment against them.



1 10. By letter dated July 21, 2009 we informed opposing counsels that we would be
2 moving to withdraw from representation of Peri. We received no response objecting to our
3 proposed motion.

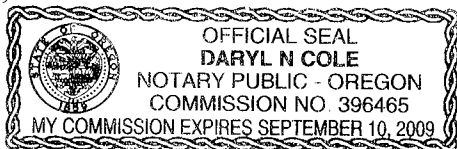
4
5 DATED this 19th day of August, 2009.

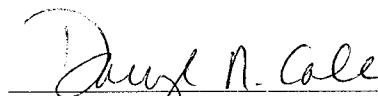
6 SCHROEDER LAW OFFICES, P.C.

7
8 

9 Laura A. Schroeder, NSB 3595
10 Attorney for Respondent

11 SUBSCRIBED AND SWORN to before me by Laura A. Schroeder this 19th day of
12 August, 2009.



15
16 
17 Notary Public for Oregon

18 My commission expires: September 10 2009
19
20
21
22
23
24
25
26

