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2 DALE E. FERGUSON
Nevada State Bar No. 4986
3 DOMENICO R. DePAOLI
Nevada State Bar No. 11553
4 WOODBURN AND WEDGE
5 6100 Neil Road, Suite 500
Reno, Nevada 89511
6 Telephone: 775 / 688-3000

7 Attorneys for Christina Batjer, Marybel Batjer, and Cameron M. Batjer Family Trust
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9
10 **IN THE UNITED STATES DISTRICT COURT**
FOR THE DISTRICT OF NEVADA
11

12 UNITED STATES OF AMERICA,)

13 Plaintiff,)

14 WALKER RIVER PAIUTE TRIBE,)

15 Plaintiff-Intervenor,)

16 v.)

17 WALKER RIVER IRRIGATION DISTRICT,)
18 a corporation, et al.,)

19 Defendants.)
20

) 3:73-cv-00127-MMD-WGC

) **AFFIDAVIT OF GORDON H.**
) **DePAOLI IN SUPPORT OF**
) **MOTION FOR WITHDRAWAL AS**
) **COUNSEL**
) **(CHRISTINA BATJER, MARYBEL**
) **BATJER, AND CAMERON M.**
) **BATJER FAMILY TRUST)**

21 STATE OF NEVADA)
) ss.
22 COUNTY OF WASHOE)

23 I, Gordon H. DePaoli, being duly sworn, depose and say:

24 1. I am an attorney at Woodburn and Wedge and am one of the attorneys of record
25 for Christina Batjer, Marybel Batjer, and Cameron M. Batjer Family Trust in the above-entitled
26 matter.
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1 2. I have personal knowledge of the facts set forth herein, am over the age of 18
2 years, and am otherwise competent to make this affidavit.

3 3. I make this affidavit in support of the Motion for Withdrawal as Counsel on
4 behalf of Christina Batjer, Marybel Batjer, and Cameron M. Batjer Family Trust.

5 4. Christina Batjer, Marybel Batjer, and Cameron M. Batjer Family Trust have
6 advised that they would like Woodburn and Wedge to withdraw as its attorneys, and that they
7 would like to proceed each as an “Unrepresented Party” in this litigation. Christina Batjer,
8 Marybel Batjer, and Cameron M. Batjer Family Trust provided the following email address for
9 service: grostcat@gmail.com
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11 5. Pursuant to the Notices received from Christina Batjer, Marybel Batjer, and
12 Cameron M. Batjer Family Trust requesting that Woodburn and Wedge withdraw as their
13 attorneys, I am making this affidavit in support of our request that the Court enter an Order on
14 the Motion to Withdraw as Counsel.
15

16 Dated: September 3, 2019

WOODBURN AND WEDGE

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18 By: /s / Gordon H. DePaoli
19 Gordon H. DePaoli, NSB 195
20 Dale Ferguson, NSB 4986
21 Domenico R. DePaoli, NSB 11553
22 *Attorneys for Christina Batjer, Marybel*
23 *Batjer, and Cameron M. Batjer Family Trust*
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CERTIFICATE OF SERVICE

I certify that I am an employee of Woodburn and Wedge and that on the 3rd day of September, 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:

Christina Batjer, Marybel Batjer and
Cameron M. Batjer Family Trust
1741 Spyglass Circle
Reno, Nevada 89509

/ s / Holly Dewar
Holly Dewar