

Julie Cavanaugh-Bill (State Bar No. 11533)
Cavanaugh-Bill Law Offices, LLC
Henderson Bank Building
401 Railroad Street, Suite 307
Elko, NV 89801
(775) 753-4357
julie@cblawoffices.org

William Falk (Utah Bar No. 16678) *Pro Hac Vice*
2980 Russet Sky Trail
Castle Rock, CO
(319) 830-6086
falkwilt@gmail.com

Terry J. Lodge (Ohio Bar No. 29271) *Pro Hac Vice*
316 N. Michigan St., Suite 520
Toledo, OH 43604-5627
(419) 205-7084
tjlodge50@yahoo.com


Attorneys for Reno-Sparks Indian Colony and Atsa koodakuh wyh Nuwu

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

WESTERN WATERSHEDS PROJECT,)	Case No. 3:21-cv-103-MMD-CLB
<i>et al.</i> ,)	3:21-cv-080-MMD-CLB
Plaintiffs,)	
)	MOTION TO WITHDRAW AS
and)	LOCAL COUNSEL
)	
RENO-SPARKS INDIAN COLONY and ATSA))	
KOODAKUH WYH NUWU/ PEOPLE OF RED))	
MOUNTAIN)	
)	
Plaintiff-Intervenor,)	
v.)	
)	
UNITED STATES DEPARTMENT OF THE))	
INTERIOR, <i>et al.</i> ,)	
)	
Defendants)	

1)
2 and)
3)
4)
5 LITHIUM NEVADA CORP.)
6)
7 Defendant-Intervenor)
8)
9)
10)

COMES NOW, CAVANAUGH-BILL LAW OFFICES, LLC, and pursuant to
LR IA 11-6 submits this Motion to Withdraw as Local Counsel for the Reno-
Sparks Indian Colony and Atsa koodakuh wyh Nuwu/People of Red Mountain in
the above captioned case. This Motion is made and based on the Points and
Authorities attached hereto.

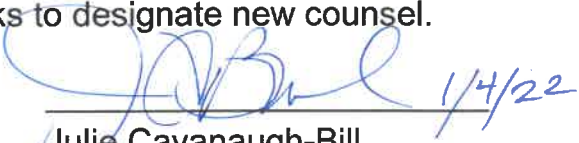

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MEMORANDUM OF POINTS AND AUTHORITIES

Julie Cavanaugh-Bill, local counsel for Reno-Sparks Indian Colony and Atsa koodakuh wyh Nuwu/People of Red Mountain (together "Intervenors") respectfully files this Motion to Withdraw as local counsel.

Pursuant to LR IA 11-6. APPEARANCES, SUBSTITUTIONS AND WITHDRAWALS, Cavanaugh-Bill Law Offices, LLC hereby respectfully moves to withdraw as local counsel for good cause as there are irreconcilable differences with pro hac co-counsel that in the opinion of the undersigned, makes the ongoing local counsel representation unreasonably difficult pursuant to Nevada Rules of Professional Conduct Rule (NRCP) 1.16(b)(6). Reasonable warning and notice has been given pursuant to NRCP 1.16(b)(5) and (d). No trial has been set for this case and discovery is on-going and should not be interrupted by this withdrawal.

Should this Motion be granted, the undersigned respectfully requests that pro hac counsel be given two weeks to designate new counsel.

 1/4/22

Julie Cavanaugh-Bill
NV Bar No.: 11533
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Elko, NV 89801
(775) 753-4357

CERTIFICATE OF SERVICE

I hereby certify that on January 4, 2022 I filed the foregoing using the United States District Court CM/ECF, which caused call counsel of record to be served electronically to all on service list.

 1-4-2022

Employee, Cavanaugh-Bill Law Offices, LLC

William Falk, Lead Attorney
Reno-Sparks Indian Colony
People of Red Mountain
2980 Russet Sky Trail
Castle Rock, CO

Terry J. Lodge, Lead Attorney
Reno-Sparks Indian Colony
People of Red Mountain
316 N. Michigan Street
Suite 520
Toledo, OH 43604

Dominic Carollo
Carollo Law Group LLC
PO Box 2456
630 SE Jackson Street, Suite 1
Roseburg, OR 97470

O. Kent Maher
P.O. Box 130
Winnemucca, NV 89446

1

2 Christopher Mixson
3 Kemp Jones LLP
4 3800 Howard Hughes Parkway
5 17th Floor
6 Las Vegas, NV 89169

7 Roger Flynn
8 P.O. Box 349
9 Lyons, CO 80540

10

11 Talasi Brooks
12 Western Watersheds Project
13 P.O. Box 2863
14 Boise, ID 83701

15

16 Jeffrey Parsons
17 Western Mining Action Project
18 P.O. Box 349
19 Lyons, CO 80540

20

21 Arwyn Carroll
22 USDOJ
23 150 M Street NE
24 Washington, DC 20002

25

26 Leilani E. Koktor
27 DOJ
28 PO Box 7611
29 Washington, DC 20044-7611

30

31 Richard K. Eichstaedt
32 Wheat Law Office
33 25 West Main Ave
34 Ste 320
35 Spokane, WA 99201

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Louis M. Bubala, III
Kaempfer Crowell
50 W. Liberty St. Ste. 700
Reno, NV 89501

Laura Granier
Holland & Hart LLP
5441 Kietzke Lane
2nd Floor
Reno, NV 89511

Erica K. Nannini
Holland & Hard LLP
5441 Kietzke Lane
2nd Floor
Reno, NV 89511

Hadassah M. Reimer
PO Box 68
25 S. Willow Street
Suite 200
Jackson, WY 83001