

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO**

STATE OF NEW MEXICO, ex. rel.)
STATE ENGINEER,)
)
Plaintiff,)
)
v.)
)
R. LEE AAMODT, et al.,)
)
Defendants,)
)
and)
)
UNITED STATES OF AMERICA,)
PUEBLO DE NAMBE,)
PUEBLO DE POJOAQUE,)
PUEBLO DE SAN ILDEFONSO,)
and PUEBLOS DE TESUQUE,)
)
Plaintiffs-in-Intervention.)

No. 66cv6639 WPJ/WPL
Sub-file RG 89217

**OBJECTOR GOSSEIN’S UNOPPOSED MOTION FOR
WITHDRAWAL AND SUBSTITUTION OF COUNSEL**

COMES NOW Defendant, Christian Gossein, by and through counsel, and hereby moves this court under 10th Cir. Rule 46.4(c), D.N.M.LR-Civ. 83.8 and D.N.M.LR-Civ. 83.4(b) to allow the withdrawal of counsel, Lorenzo Atencio, as attorney of record and to substitute as counsel, Andrea La Cruz-Crawford, Esquire to represent him in the above captioned matter for the following reasons:

1. Lorenzo Atencio must withdraw from representation due to health reasons.
2. Christian Gossein agrees to substitute counsel, Andrea La Cruz-Crawford, Esq.in place of Lorenzo Atencio, Esq.

3. Andrea La Cruz-Crawford, is a member in good standing of the federal 10th Circuit Bar and attaches her proposed Entry of Appearance (Exhibit 1) to be filed on behalf of Christian Gossein if the court finds this motion is well taken in accordance with and D.N.M.LR-Civ. 83.4(b) and D.N.M.LR-Civ. 83.8.

3. This motion was submitted to opposing counsel for concurrence on July 1, 2015 in accordance with D.N.M.LR-CV 7.1 (a) and opposing counsel does not object to this motion.

Prayer for Relief

WHEREFORE, the Defendant respectfully requests that this Court grant this Motion for Substitution and Withdrawal of Counsel.

Respectfully Submitted,

/s/Andrea La Cruz-Crawford

Andrea La Cruz- Crawford, Esq.

PO Box 31058

Santa Fe, NM 87594

Tel. (505) 577-9692

/s/ approved electronically 6/30/15

Lorenzo Atencio, Esq.

PO Box 1538

Espanola, NM 87532

Tel. (505) 920-7382

CERTIFICATE OF SERVICE

I hereby certify that on July 7, 2015, I caused the foregoing to be filed electronically through the CM/ECF system which caused parties on the electronic service list to be served as described in the Notice of Electronic Filing.

/s/ Andrea La Cruz-Crawford electronically

Andrea La Cruz-Crawford

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ENTRY OF APPEARANCE

COMES NOW Andrea La Cruz-Crawford, Esq., attorney-at-law, and does hereby enter her appearance as counsel for Defendant-Objector, Christian Gossein, representing him in his objection to the proposed current settlement pending before the Court with regard to the Partial Final Judgment and Decree of the Pueblos' water rights, as well as the adjudication of Mr. Gossein's domestic well water rights in the above referenced cause.

Respectfully submitted,

/s/ Andrea La Cruz-Crawford
Andrea La Cruz-Crawford
Attorney at Law
PO Box 31058

Santa Fe, NM 87594
(505) 577-9692
andrea@streeperfirm.com

CERTIFICATE OF SERVICE

I hereby certify that on _____ 2015, I caused the foregoing to be filed electronically through the CM/ECF system which caused parties on the electronic service list to be served as described in the Notice of Electronic Filing.

Andrea La Cruz-Crawford