

STATE OF COLORADO OFFICE OF ADMINISTRATIVE COURTS 1525 Sherman Street, 4th floor Denver, Colorado 80203	▲ COURT USE ONLY ▲
BEFORE THE SECRETARY OF STATE, COLORADO DEPARTMENT OF STATE, in re ED 2022-94, 2022-98 ELECTIONS DIVISION OF THE SECRETARY OF STATE, Complainant, vs. FOOTHILLS FIRE PROTECTION DISTRICT, DUEY FREEMAN PAUL DEETH SCOTT FERGUSON STEVE BECK TJ CARNEY, and ALAN ANDERSON Respondents.	
<i>Attorneys for Respondent Foothills Fire Protection District</i> Dylan Woods, Atty. #46731 Coaty and Woods, P.C. 1202 Bergen Parkway, Suite 110 Evergreen, CO 80439 Phone: 303-674-0800 Fax: 303-674-8492 dwoods@evergreenco.law	Case Number: AHO 2023-009 Div.:
RENEWED MOTION TO WITHDRAW	

Comes now, Dylan Woods, and the law firm of Coaty and Woods, P.C., undersigned attorneys for the Respondent, Foothills Fire Protection District, in the within action, and moves the Hearing Officer for an Order authorizing withdrawal as counsel.

C.R.C.P. Rule 121: Undersigned Counsel for Respondent conferred with Complainant’s Counsel, who does not object to the relief requested in this Motion.

AS GROUNDS FOR THIS MOTION, counsel states as follows:

1. Client has terminated the attorney-client relationship and requested to proceed without representation of this firm. Counsel gave actual notice to the client prior to filing this Motion.
2. Such withdrawal will not have a material adverse effect on the interests of the client.
3. Any written orders submitted and entered by the court directing action of the withdrawing attorney have been complied with by the withdrawing attorneys.
4. Respondent and all other parties of record have been given written notification of counsel's intent to withdraw from this matter, as evidenced by counsel's advisements to client below.

ADVISEMENTS TO CLIENT

1. The Court will retain jurisdiction over the parties and subject matter of this action.
2. You will have the burden of keeping the Hearing Officer and other parties informed where notices, pleadings, or other papers may be served upon her.
3. If you fail or refuses to comply with all court rules and orders, you may suffer possible dismissal, default or other sanctions.
4. The dates of any proceedings, including trial which dates will not be delayed nor proceeding affected by the withdrawal of counsel are as follows:
 - I. Each of the Respondents is ordered to file an Answer to the July 21, 2023 Administrative Complaint on or before May 17, 2024.
 - II. All discovery shall be completed by June 14, 2024.
 - III. Prehearing Statements in accordance with CPF Rule 24.11, 8 CCR 1505-6, shall be filed no later than 5:00 PM Friday, July 12, 2024.
5. Respondent's last known address and telephone number are:

28812 Rainbow Hill Road, Evergreen, CO 80439
303-526-0707

6. The Respondent and any other party have the right to object to counsel's withdrawal from the above-captioned matter within fourteen (14) days of the date of service of this motion.

Respectfully submitted this 10th day of May, 2024.

COATY and WOODS, P.C.



Dylan Woods
Attorney for Respondent
Foothills Fire Protection District

CERTIFICATE OF SERVICE

I hereby certify that I have served a true and correct copy of the foregoing to the following this 10th day of May, 2024.

Duey Freeman dueyfreeman@gmail.com <i>Respondent</i>	Paul Deeth pdeeth@comcast.net <i>Respondent</i>
Scott Ferguson Molyminer88@gmail.com <i>Respondent</i>	Steve Beck lravenquest@gmail.com <i>Respondent</i>
TJ Carney tjffpd@carneylaw.net <i>Respondent</i>	Alan Anderson aanderson@hfpdco.org <i>Respondent</i>

Robert Heine rmheine1@msn.com <i>Third-Party Complainant</i>	Pati Stajcar p@stajcar.com <i>Third-Party Complainant</i>
PETER G. BAUMANN Senior Assistant Attorney General peter.baumann@coag.gov *Counsel of Record for the Elections Division	AdministrativeHearingOfficer@coloradosos.gov



Dylan Woods
Attorney for Respondent
Foothills Fire Protection District