

1 C. D. Michel, Cal. B.N. 144258
W. Lee Smith, Cal. B.N. 196115
2 Scott M. Franklin, Cal. B.N. 240254
MICHEL & ASSOCIATES, PC
3 180 E. Ocean Boulevard, Suite No. 200
Long Beach, CA 90802
4 Telephone: 562-216-4444
Facsimile: 562-216-4445
5 Emails: cmichel@michellawyers.com
lsmith@michellayers.com
6 sfranklin@michellawyers.com

7 Michael T. Jean
National Rifle Association of America
8 Institute for Legislative Action
11250 Waples Mill Rd., Ste. 5n
9 Fairfax, VA 22030
Telephone: 703-267-1158
10 Facsimile: 703-267-1164
Email: mjean@nrahq.org

11 Attorneys for Defendants-
12 Intervenor National Rifle Association
of America

13 **IN THE UNITED STATES DISTRICT COURT**
14 **FOR THE DISTRICT OF ARIZONA**
15 **PRESCOTT DIVISION**

16 Center for Biological Diversity, et al.,

17 Plaintiffs,

18 vs.

19 United States Forest Service,

20 Defendant, and

21 National Rifle Association of America;
22 Safari Club International; and National
Shooting Sports Foundation, Inc.,

23 Defendants-Intervenors.
24
25
26
27
28

CASE NO. 3:12-cv-08176-PCT-SMM

**DEFENDANT-INTERVENOR
NATIONAL RIFLE ASSOCIATION OF
AMERICA'S APPLICATION FOR
SUBSTITUTION OF ATTORNEY**

1 TO THE HONORABLE COURT, ALL PARTIES, AND THEIR COUNSEL OF
2 RECORD:

3 PLEASE TAKE NOTICE that the law firm Michel & Associates, P.C., and its
4 attorneys C.D. Michel, W. Lee Smith, and Scott M. Franklin, apply to this Court for leave
5 to withdraw as counsel of record for Defendant-Intervenor National Rifle Association of
6 America. This request is made pursuant to United States District Court of Arizona Local
7 Rule 83.3(b)(1).

8 Withdrawal will neither prejudice the client nor delay trial, as trial has not been
9 currently set.

10 Good cause exists, as further set forth in the supporting declaration of W. Lee
11 Smith, due to the mutual agreement between Michel & Associates, P.C. attorneys and
12 National Rifle Association of America's in-house counsel, Michael T. Jean providing that
13 C.D. Michel, W. Lee Smith and Scott M. Franklin withdraw from this matter with
14 Michael T. Jean substituting as attorney of record.

15 Therefore, the attorneys respectfully request that this Court grant the application of
16 Michel & Associates, P.C., including its appearing attorneys C.D. Michel, W. Lee Smith,
17 and Scott M. Franklin, to withdraw from further representation of the client.

18 The client is aware of the attorneys' application to withdraw.

19
20 Dated: May 27, 2020

MICHEL & ASSOCIATES, P.C.



C.D. Michel
Attorney for Intervenor National Rifle
Association of America

21
22
23
24
25 Dated: May 26, 2020

National Rifle Association of America



Michael T. Jean

CERTIFICATE OF SERVICE

Case Name: *Center for Biological Diversity, et al. v. United States Forest Service*
Case No.: 3:12-cv-08176-PCT-SMM

IT IS HEREBY CERTIFIED THAT:

I, the undersigned, am a citizen of the United States and am at least eighteen years of age. My business address is 180 East Ocean Boulevard, Suite 200, Long Beach, California 90802.

I am not a party to the above-entitled action. I have caused service of:

DEFENDANT-INTERVENOR NATIONAL RIFLE ASSOCIATION OF AMERICA'S APPLICATION FOR SUBSTITUTION OF ATTORNEY

on the following party by electronically filing the foregoing with the Clerk of the District Court using its ECF System, which electronically notifies them.

Michael Charles Augustini
US Dept of Justice
P.O. Box 23986
Washington, DC 20026-3986
Telephone: 202-616-6519
Email: michael.augustini@usdoj.gov
Attorney for Defendant, United States Forest Service

Kevin M. Cassidy
Earthrise Law Center
Lewis & Clark Law School
P.O. Box 445
Norwell, MA 02061
Telephone: 781-659-1696
Email: cassidy@lclark.edu
Attorney for Plaintiffs

Allison LaPlante
Earthrise Law Center
Lewis & Clark Law School
10015 S.W. Terwilliger Blvd.
Portland, OR 97211
Telephone: 503-768-6894
Email: laplante@lclark.edu
Attorney for Plaintiffs

Adam F. Keats
Center for Biological Diversity
351 California St., Ste. 600
San Francisco, CA 94104
Telephone: 415-436-9682
Email: akeats@centerforfoodsafety.org
Attorney for Plaintiffs

Norman D. James
Rhett A. Billingsley
Fennemore Craig, P.C.
2394 E. Camelback Road, Suite 600
Phoenix, AZ 85016-2394
Telephone: 602-916-5000
Email: njames@fclaw.com
rbilling@fclaw.com
Attorneys for Defendant Intervenor National Shooting Sports Foundation, Inc.

Leo John LeSueur
Office of the Attorney General
2005 N Central Ave
Phoenix, AZ 85004-1592
Telephone: 602-542-0640
Email: john.lesueur@azag.gov
Attorney for Defendant Intervenor, State of Arizona

I declare under penalty of perjury that the foregoing is true and correct.

Executed May 27, 2020.



Laura Palmerin