

No. 137, ORIGINAL

---

IN THE  
SUPREME COURT OF THE UNITED STATES

---

STATE OF MONTANA, Plaintiff

V.

STATE OF WYOMING

AND

STATE OF NORTH DAKOTA, Defendants

---

BEFORE THE HONORABLE BARTON H. THOMPSON, JR.  
SPECIAL MASTER

---

MOTION TO WITHDRAW AS COUNSEL

PETER K. MICHAEL\*  
Attorney General

JAY JERDE  
Special Assistant Attorney General  
JAMES KASTE  
Deputy Attorney General  
CHRISTOPHER BROWN  
Senior Assistant Attorney General  
MATTHIAS SAYER  
Assistant Attorney General  
ANDREW KUHLMANN  
Assistant Attorney General  
123 Capitol Building  
Cheyenne, WY 82002  
(307) 777-6196

*\*Counsel of Record*

Matthias L. Sayer, counsel in this matter for Defendant State of Wyoming, respectfully requests the Court for entry of an Order permitting his withdrawal as counsel.

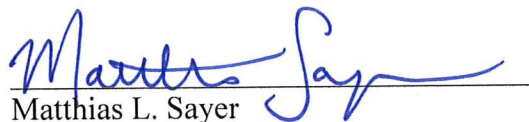
This motion is made on the following grounds:

1. Mr. Sayer is leaving the employment of the Wyoming Attorney General's Office effective March 27, 2015, and can no longer effectively represent the Defendant in the above-captioned case.
2. Peter K. Michael, Jay Jerde, James Kaste, Christopher Brown, and Andrew Kuhlmann of the State of Wyoming Attorney General's Office have previously appeared in this matter and will be handling all further proceedings. There will be no delay or prejudice to the Defendant as a result of Mr. Sayer's withdrawal.

Dated this 6<sup>th</sup> day of March, 2015.

Respectfully submitted,

THE STATE OF WYOMING



Matthias L. Sayer  
Senior Assistant Attorney General  
123 Capitol Building  
Cheyenne, WY 82002  
307-777-6946

## CERTIFICATE OF SERVICE

The undersigned certifies that a true and correct copy of the Motion to Withdraw as Counsel was served by electronic mail and by placing the same in the United States mail, postage paid, this 1<sup>st</sup> day of March, 2015.

John B. Draper  
Draper & Draper  
325 Paseo de Peralta  
Santa Fe, NM 87501  
John.draper@draperllc.com

Jeffrey Wechsler  
Montgomery & Andrews  
325 Paseo de Peralta  
Santa Fe, NM 87501  
jwechsler@montand.com

James J. Dubois  
United States Department of Justice  
Environmental and Natural Resources  
Division of Natural Resources Section  
999 18th St. #370 South Terrace  
Denver, CO 80202  
[James.dubois@usdoj.gov](mailto:James.dubois@usdoj.gov)

Michael Wigmore  
Vinson & Elkins  
2200 Pennsylvania Ave., NW  
Suite 500 W  
Washington, DC 20007  
[mwigmore@velaw.com](mailto:mwigmore@velaw.com)

Jeanne S. Whiteing  
Whiteing & Smith  
1628 5th Street  
Boulder, CO 80302  
[jwhiteing@whiteinglaw.com](mailto:jwhiteing@whiteinglaw.com)

Alan L. Joscelyn  
Montana Attorney General's Office  
P.O. Box 201401  
Helena, MT 59620-1401  
[alanjoscelyn@mt.gov](mailto:alanjoscelyn@mt.gov)

Jennifer Verleger  
North Dakota Attorney General's Office  
500 North Ninth Street  
Bismarck, ND 58501  
[jverleger@nd.gov](mailto:jverleger@nd.gov)

Solicitor General of the United States  
US Department of Justice  
950 Pennsylvania Avenue, Room 5614  
Washington, DC 20530-0001  
[SupremeCtBriefs@usdoj.gov](mailto:SupremeCtBriefs@usdoj.gov)

Barton H. Thompson Jr.  
Susan Carter, Assistant  
Jerry yang and Akiko Yamazaki  
Environment & Energy Building, MC-4205  
473 via Ortega  
Stanford, CA 94305-4205  
[Susan.carter@stanford.edu](mailto:Susan.carter@stanford.edu)

  
\_\_\_\_\_  
Wyoming Attorney General's Office