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Movants

IN THE UNITED STATES DISTRICT COURT

DISTRICT OF OREGON
(Medford Division)

LLOYD D. WHALEY, TODD L.
WHALEY, BRIAN NOLTE, JEFF
BOARDMAN, MISS SARAH, LLC, and
DYNAMIK FISHERIES, INC.,

Plaintiffs,

v.

PACIFIC SEAFOOD GROUP, DULCICH,
INC., FRANK DULCICH, PACIFIC
SEAFOOD GROUP ACQUISITION
COMPANY, INC., PACIFIC SEAFOOD
WASHINGTON ACQUISITION CO.,
INC., BANDON PACIFIC, INC., BIO-
OREGON PROTEIN, INC., PACIFIC
CHOICE SEAFOOD COMPANY,
PACIFIC COAST SEAFOODS
COMPANY, PACIFIC GARIBALDI, INC.,
PACIFIC GOLD SEAFOOD COMPANY,
PACIFIC PRIDE SEA FOOD COMPANY,
PACIFIC SEA FOOD CO., PACIFIC
SURIMI CO., INC., PACIFIC TUNA
COMPANY, LLC, WASHINGTON CRAB
PRODUCERS, INC., PACIFIC ALASKA
SHELLFISH, INC., SEA LEVEL
SEAFOODS, LLC, ISLAND FISH CO.,
LLC, PACIFIC RESURRECTION BAY,
PACIFIC CONQUEST, INC., CALAMARI,

Civil No. 1:10-cv-03057-PA

**UNOPPOSED
MOTION FOR LEAVE TO
WITHDRAW AS COUNSEL**

**EXPEDITED CONSIDERATION
REQUESTED**

LLC, JO MARIE, LLC, LESLIE LEE, LLC,))
 MISS PACIFIC, LLC, PACIFIC FUTURE,))
 LLC, PACIFIC GRUMPY J, LLC,))
 PACIFIC HOOKER, LLC, PACIFIC))
 HORIZON, LLC, PACIFIC KNIGHT, LLC,))
 PRIVATEER, LLC, SEA PRINCESS, LLC,))
 TRIPLE STAR, LLC, PACIFIC FISHING,))
 LLC, PACIFIC SEA FOOD OF ARIZONA,))
 INC, STARFISH INVESTMENTS, INC.,))
 DULCICH SURIMI, LLC, BIO-OREGON))
 PROPERTIES, LLC, PACIFIC GROUP))
 TRANSPORT CO., PACIFIC))
 MARKETING GROUP, INC., PACIFIC))
 RUSSIA, INC., PACIFIC RUSSIA))
 VENTURES, LLC, PACIFIC TUNA))
 HOLDING COMPANY, INC., POWELL))
 STREET MARKET, LLC, PACIFIC))
 FRESH SEA FOOD COMPANY,))
 SEACLIFF SEAFOODS, INC., COPPER))
 RIVER RESOURCE HOLDING CO., INC,))
 PACIFIC COPPER RIVER ACQUISITION))
 CO., INC., SEA LEVEL SEAFOODS))
 ACQUISITION, INC., ISLAND COHO,))
 LLC, S&S SEAFOOD CO., INC., PACIFIC))
 SEAFOOD DISC., INC., DULCICH))
 REALTY, LLC, DULCICH REALTY))
 ACQUISITION, LLC, DULCICH JET,))
 LLC and OCEAN GOLD SEAFOODS,))
 INC.))

Defendants.

Local Rule 7-1 Certification

The undersigned counsel certifies that Pacific and Pacific’s local counsel do not object to this motion.

Motion for Leave to Withdraw as Counsel

Pursuant to LR 83-11, Robert E. Bloch, Scott P. Perlman, Mitchell D. Raup, John Nadolenco and Mayer Brown LLP (“Movants”) move for leave to withdraw as counsel in the above captioned matter, and in support thereof, state to the Court as follows:

1. Movants were retained by Frank Dulcich and Pacific Seafood Group (collectively, “Pacific”) to represent them in the above-referenced matter and in connection therewith were admitted *pro hac vice* to appear in this action.

2. Pacific is also represented by Michael Esler, John Stephens, and Kim Buckley of Esler Stephens and Buckley, and by Robert Preston of Elliott, Ostrander & Preston, all of whom who are admitted to practice before this court and have appeared as counsel of record for Pacific in this action.

3. Pursuant to LR 83-11(c), Movants informed one of Pacific’s local counsel, Robert Preston, of Movants’ intent to withdraw. On or about February 13, 2012, Movants and Pacific agreed that Movants would withdraw from this case.

4. Pacific is and will continue to be represented by Esler, Stephens and Buckley, who have been actively involved in this matter since its inception, and Robert Preston of Elliott, Ostrander and Preston, all of whom are knowledgeable about the case.

5. Accordingly, for the reasons stated herein, Movants respectfully request that the Court grant them leave to withdraw as counsel.

Dated this 15th day of February, 2012.

By: s/ Robert E. Bloch
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Mitchell D. Raup, *pro hac vice*
John Nadolenco, *pro hac vice*
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CERTIFICATE OF SERVICE

Pursuant to LR 100-8, the foregoing Motion for Leave to Withdraw as Counsel was filed through the Court's CM/ECF system, which will serve copies electronically on all counsel of record, including local counsel for Pacific. In addition, pursuant to LR 83-11(c), I have served this motion on Frank Dulcich and Pacific Seafood Group, by sending a copy by U.S. mail and email to the following addresses:

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s/ Mitchell D. Raup
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