

<p>DISTRICT COURT, LARIMER COUNTY, COLORADO  201 LaPorte Avenue  Fort Collins, CO 80521</p>	<p>DATE FILED: June 5, 2018 9:38 AM  FILING ID: A3FE2FE5B7C37  CASE NUMBER: 2018CV149</p>
<p><b>Plaintiff:</b>  ERIC SUTHERLAND, <i>pro se</i></p> <p>v.</p> <p><b>Defendants:</b>  THE CITY OF FORT COLLINS, a home rule municipality in the State of Colorado; STEVE MILLER, in his capacity as the Larimer County Assessor and all successors in this office; IRENE JOSEY, in her capacity as the Larimer County Treasurer and all successors to this office; and</p> <p>Indispensable Parties: THE TIMNATH DEVELOPMENT AUTHORITY, an Urban Renewal Authority; and COMPASS MORTGAGE CORPORATION, an Alabama company doing business in Colorado.</p>	<p>▲ COURT USE ONLY ▲</p>
<p>Attorneys for The Timnath Development Authority and Compass Mortgage Corporation:</p> <p>Eric R. Burris, <i>pro hac vice</i> pending  BROWNSTEIN HYATT FARBER SCHRECK, LLP  201 Third Street NW, Suite 1800  Albuquerque, NM 87102  Telephone: 505.244.0770  Email: eburris@bhfs.com</p> <p>Cole J. Woodward, #50199  BROWNSTEIN HYATT FARBER SCHRECK, LLP  410 Seventeenth Street, Suite 2200  Denver, CO 80202-4432  Phone: 303.223.1100  Email: cwoodward@bhfs.com</p>	<p>Case Number: 2018CV149</p> <p>Division: 3C</p>
<p style="text-align: center;"><b>OUT OF STATE COUNSEL’S VERIFIED MOTION REQUESTING  PRO HAC VICE ADMISSION OF ERIC R. BURRIS</b></p>	

Pursuant to C.R.C.P. 121 § 1-2, and Rule 221, Eric R. Burris of the New Mexico office of Brownstein Hyatt Farber Schreck, LLP moves for *pro hac vice* admission to practice before this Court in the above-captioned matter.

AS GROUNDS FOR THIS MOTION, Eric R. Burris states and shows the Court the following:

1. Under Rule 221, an attorney and counselor at law in good standing from any other jurisdiction in the United States may, in the discretion of a Colorado court of record, be permitted to participate before the Court in a trial, argument and other proceeding in the particular case in which the attorney is employed, provided that a member in good standing of the Bar of the State of Colorado is associated in such cause at all stages of the case.

2. Eric R. Burris of the New Mexico office of Brownstein Hyatt Farber Schreck, LLP is a member in good standing of the State Bar of New Mexico. Eric R. Burris is assigned attorney registration or bar admission number 5598 in New Mexico.

3. Eric R. Burris has also not been licensed in any other jurisdictions.

4. Eric R. Burris is in good standing in all Bars wherever admitted and no discipline or grievance proceedings have been filed or are pending.

5. Eric R. Burris has sought and been granted *pro hac vice* admission in the State of Colorado in the following Larimer County District Court cases within the last five years:

2018CV30269: In the Matter of SW Prospect I25 Metropolitan District Nos. 1-7;  
2018CV30270: In the Matter of Gateway at Prospect Metropolitan District Nos. 1-7;  
2018CV30272: In the Matter of Rudolph Farms Metropolitan District Nos. 1-6; and  
2018CV30278: In the Matter of I-25/Prospect Interchange Metropolitan District.

6. Eric R. Burris acknowledges that he is subject to all applicable provisions of the Colorado Rules of Professional Conduct and the Colorado Rules of Civil Procedure and that he has read such rules.

7. Cole J. Woodward, #50199, is a member in good standing of the Bar of the State of Colorado.

8. Cole J. Woodward will be present and participate in a meaningful and substantial manner throughout the proceedings and trial of this matter.

9. The following are parties to the proceeding and have been notified of this Verified Motion requesting *pro hac vice* admission: Plaintiff Eric Sutherland, *pro se*, who will be notified via electronic mail.

10. Eric R. Burris has filed a copy of this motion with the Clerk of the Colorado Supreme Court at the Attorney Registration Office, 1300 Broadway, Suite 510, Denver, Colorado 80203 and paid the required fee.

11. An affidavit setting forth Eric R. Burris' qualifications and compliance is attached.

WHEREFORE, Out of State Counsel respectfully requests that the Court admit Eric R. Burris *pro hac vice*, to practice before the Court in this case.

Respectfully submitted on the 5<sup>th</sup> day of June, 2018.

BROWNSTEIN HYATT FARBER SCHRECK, LLP

By: s/Eric R. Burris  
Eric R. Burris, *pro hac vice pending*

By: s/Cole J. Woodward  
Cole J. Woodward, #50199

Robert G. Rogers, #43578  
Casey K. Lekahal, #46531  
WHITE BEAR ANKELE TANAKA & WALDRON

Attorneys for The Timnath Development Authority and  
Compass Mortgage Corporation

**CERTIFICATE OF SERVICE**

I hereby certify that on this 5<sup>th</sup> day of June, 2018, a true and correct copy of the foregoing  
**OUT OF STATE COUNSEL'S VERIFIED MOTION REQUESTING PRO HAC VICE  
ADMISSION OF ERIC R. BURRIS** was filed with the Court and served via Colorado Courts  
E-Filing System on *pro se* Plaintiff as follows:

***By E-Mail and Regular Mail***  
Eric Sutherland  
3520 Golden Currant Boulevard  
Fort Collins, CO 80521  
Phone: 970.224.4509  
Email: sutherix@yahoo.com

*s/Penny G. Lalonde*  
Penny G. Lalonde, Paralegal

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