

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

PRIME ALLIANCE BANK, INC.,
a Utah banking corporation;
and SERTANT CAPITAL, LLC,
a Delaware limited liability company,

Case No. 1:23-cv-10564-LJM-PTM
Hon. Laurie J. Michelson

Plaintiffs

v

THE GREAT LAKES TISSUE COMPANY,
a Michigan corporation,

Defendant.

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NOTICE OF MOTION AND MOTION TO WITHDRAWAL OF COUNSEL

PLEASE TAKE NOTICE that Attorneys Thomas A. Janczewski and Timothy M. Hansen respectfully move to withdraw as counsel for Defendant The Great Lakes Tissue Company in the above matter, pursuant to Eastern District of Michigan Local Rule 83.25(b)(2).

LEGAL STANDARD

Eastern District of Michigan Local Rule 83.25(b)(2) provides that an “attorney may withdraw . . . only on order of the Court.” In the Sixth Circuit, “attorney withdrawal issues are committed to the court’s discretion.” *Brandon v. Blech*, 560 F.3d 536, 537 (6th Cir. 2009). A client’s failure to timely pay its legal bills and communicate with counsel is a proper basis to withdraw as counsel. *See id.*

MOTION

In support of this motion to withdraw, counsel states as follows:

1. Counsel was retained by The Great Lakes Tissue Company to provide legal representation in connection with the above-captioned case.
2. The Great Lakes Tissue Company has failed to pay legal bills for several months, constituting a material breach of the agreement for legal services.
3. Despite repeated attempts, counsel has been unable to communicate with The Great Lakes Tissue Company as they have ceased responding to emails and other correspondence.
4. As a result of the unpaid fees and lack of communication, counsel is unable to effectively represent The Great Lakes Tissue Company and believes it would be in the best interest of both parties for counsel to withdraw.

WHEREFORE, for the reasons stated above, counsel respectfully requests that this Court enter an order permitting the withdrawal of Attorneys Thomas A. Janczewski and Timothy M. Hansen as counsel of record for The Great Lakes Tissue Company. Counsel further requests that all future pleadings, correspondence, and notices in this action be served directly upon The Great Lakes Tissue Company.

Dated October 11, 2023

HANSEN REYNOLDS LLC

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