

FILED
03-13-2024
Clerk of Circuit Court
Brown County, WI
2023CV000652

STATE OF WISCONSIN CIRCUIT COURT BROWN COUNTY

GREAT LAKES TISSUE GROUP, LLC
Plaintiff,
v.

Case No.: 23-CV-652
Case Codes: 30303, 30304

PATRIOT ADVANCED ENVIRONMENTAL
TECHNOLOGIES, LLC and 4 R PLANET, LLC
Defendants.

NOTICE OF MOTION AND MOTION TO WITHDRAW AS COUNSEL

TO THE COURT, ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that Christopher T. Koehnke, Mark E. Schmidt and von Briesen & Roper, s.c. (“Movants”) hereby move the Court, pursuant to Wis. Stat. § 802.01(2) for permission to withdraw as counsel for Plaintiff Great Lakes Tissue Group, LLC, and to be removed from the service list in this case.

The grounds for this Motion are:

1. Plaintiff has failed substantially to fulfill an obligation to the lawyer regarding the lawyer’s services and have been given reasonable warning that the lawyer will withdraw unless the obligation is fulfilled.
2. Movants’ continued representation of the Plaintiff will result in an unreasonable financial burden on Movants;
3. Other good cause for withdrawal exists as more fully set forth in the Affidavit in Support of Motion to Withdraw.

A lawyer may withdraw from representing a client if:

(5) the client fails substantially to fulfill an obligation to the lawyer regarding the lawyer's services and has been given reasonable warning that the lawyer will withdraw unless the obligation is fulfilled;

(6) the representation will result in an unreasonable financial burden on the lawyer or has been rendered unreasonably difficult by the client; or

(7) other good cause for withdrawal exists.

SCR 20:1.16(b) 4, 5, 6, 7.

Plaintiff has the opportunity to find alternative counsel to represent their interests in this matter and to take this matter to trial if needed.

WHEREFORE, Movants request an Order from this Court, without hearing, permitting their withdrawal as attorneys for the Plaintiff in this action, and permit Plaintiff 30 days to locate new counsel.

Dated this 13th day of March, 2024.

VON BRIESEN & ROPER, S.C.

By: *Electronically Signed by Christopher T. Koehnke*

Christopher T. Koehnke, SBN 1076031

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von BRIESEN & ROPER, s.c.

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