

Submitting Attorney (Utah State Bar No.) Laura J. Wolff (14531)
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Attorney for Merit Consultants International

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF UTAH

In re: CS Mining, LLC	Bankruptcy No. 16-24818
Debtor(s).	Chapter 11
	Hon. William T. Thurman

MOTION TO WITHDRAW AS COUNSEL

1. Pursuant to Local Rule 2091-2, Laura J. Wolff (“Counsel”),
hereby moves to withdraw as counsel for:

Client Name: (the “Client”) Merit Consultants International
Address: 401-750 West Pender Street
City, State, Zip: Vancouver, BC, V6C 2T8
Telephone Number(s): (604) 669-8444
E-Mail Address: ithompson@meritconsulting.com

2. The reasons for withdrawal are as follows:
Client assigned claim to another party then indicated my services are no longer required. I need to be removed from all professional responsibility with regard to the claims as I no longer represent the client.

I need to be removed from the service list!!!
The client has only filed a proof of claim.

3. In the event this motion is granted, Client or new counsel for Client (including new counsel in the withdrawing attorney’s law firm), must file a notice of appearance within 21 days after entry of the order, unless otherwise ordered by the court. Pursuant to Local Rule 9011-2(a),

no corporation, association, partnership, limited liability company or other artificial entity may appear pro se, but must be represented by an attorney who is admitted to practice in this court.

4. This motion is made: [*State the alternative that applies*]

☒ with the client's consent, which is attached to this motion; or

☐ without client's consent and is accompanied by:

☐ certification that Client has been served with (i) a copy of this motion, (ii) the attached written description of the status of the case, including the dates and times of any scheduled court proceedings, pending compliance with any existing court orders, and the possibility of sanctions;

or

☐ certification that the Client cannot be located or, for any other reason, cannot be notified of the pendency of the motion and status of the case.

5. The undersigned certifies: [*State the alternative that applies*]

☒ there are no pending motions or trials; or

☐ a hearing on [].

☐ a certification signed by Counsel is attached indicating that Client is prepared for trial as scheduled and is eligible pursuant to Local Rule 9011-2(b) to appear *pro se* at trial; or

☐ the following specific facts justify withdrawal of counsel without the present appearance of substitute counsel or the appearance by the individual party *pro se*:

[

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CERTIFICATION

Counsel hereby certifies that a copy of this Motion for Withdrawal of Counsel has been sent to the Client at the address indicated above.

Dated this 29 Day of January , 2018 .

/s/ Laura J. Wolff

Moving Attorney

CERTIFICATE OF SERVICE

(Attach Local Form 9013-3)

CM/ECF ELECTRONIC SERVICE:

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Subject: RE: CS Mining In Bankruptcy -- Transfer of Claim
From: Ian Thompson <ithompson@meritconsultants.net>
Date: 1/12/2018 9:37 AM
To: Evan James <elj@cjmlv.com>

Evan

Confirmed

Ian

-----Original Message-----

From: Evan James [mailto:elj@cjmlv.com]

Sent: January-11-18 3:19 PM

To: Ian Thompson <ithompson@meritconsultants.net>; Jay Collins <jaycollins51@aol.com>; Dave Rees <drees@meritconsultants.net>

Cc: Laura Wolff <ljlw@cjmlv.com>

Subject: Re: CS Mining In Bankruptcy -- Transfer of Claim

Please confirm that notices may properly be sent to you as follows:

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ithompson@meritconsulting.com

401 - 750 West Pender Street, Vancouver, British Columbia, Canada V6C 2T8

Christensen James & Martin

Evan L. James, Esq.

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Las Vegas, NV 89117

Tel. (702) 255-1718

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On 1/10/2018 1:12 PM, Ian Thompson wrote:

Evan

Thank you

[REDACTED]

AS far as what we need done, [REDACTED]
we no longer need your representation on this matter, please advise
the court of your withdrawal

Best Regards,

IAN THOMPSON CPA, CA | DIVISION CONTROLLER

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E: ithompson@meritconsultants.net

-----Original Message-----

From: Evan James [<mailto:elj@cjmlv.com>]

Sent: January-10-18 10:57 AM

To: Ian Thompson <ithompson@meritconsultants.net>; Jay Collins
<jaycollins51@aol.com>; Dave Rees <drees@meritconsultants.net>

Cc: Laura Wolff <ljw@cjmlv.com>

Subject: Re: CS Mining In Bankruptcy -- Transfer of Claim

[REDACTED]

[REDACTED]