

UNITED STATES BANKRUPTCY COURT
DISTRICT OF MASSACHUSETTS

In Re:

TELEXFREE, LLC
TELEXFREE, INC.
TELEXFREE FINANCIAL, INC.,

Debtors,

STEPHEN DARR, AS HE IS TRUSTEE OF
THE CHAPTER 11 ESTATES OF EACH OF
THE DEBTORS

Plaintiff,

v.

GERALD P. NEHRA, NEHRA & WAAK

Defendant

Chapter 11 Cases

14-40987-MSH
14-40988-MSH
14-40989-MSH

Jointly Administered

Adversary Proceeding No. 16-04025

**SEYFARTH SHAW LLP AND WILLIAM J. HANLON'S MOTION FOR LEAVE TO
WITHDRAW AS COUNSEL FOR DEFENDANT**

Pursuant to Massachusetts Local Bankruptcy Rule 9010-3 and Massachusetts Rules of Professional Conduct Rule 1.16(a)(3),¹ William J. Hanlon and Seyfarth Shaw LLP ("Counsel"), attorney for Defendants Gerald P. Nehra and Law Offices of Nehra & Waak ("Defendants"), hereby requests leave to withdraw as counsel of record for Defendants. In support of its motion, Counsel states as follows:

¹ Massachusetts Rules of Professional Conduct 1.16(a)(3) states that an attorney shall withdraw from representing a client if the lawyer is discharged.

