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Attorneys for Jeffrey Baron, Alleged Debtor

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

IN RE:

JEFFREY BARON,

Alleged Debtor.

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Bankr. No. 12-37921-SGJ

MOTION TO WITHDRAW

COME NOW Busch, Ruotolo & Simpson, LLP, Alan L. Busch, and Christopher M. Albert (collectively "Counsel"), counsel of record for **Jeffrey Baron**, the Alleged Debtor in the above-styled case, who file this their Motion to Withdraw as counsel of record, and in support thereof, would show unto this Court s follows:

1. Counsel agreed to serve as counsel to the Alleged Debtor in his involuntary bankruptcy case on January 24, 2013. Counsel was officially retained to serve as counsel for the Alleged Debtor when, on January 28, 2013, the Alleged Debtor signed the client agreement between himself and counsel, a true and correct copy of which is attached hereto as Exhibit "A".

2. The client agreement identifies and limits the scope of Counsel's engagement, and provides that Counsel would defend the Alleged Debtor in the involuntary proceeding above. It expressly provides that Counsel's responsibility to represent the Alleged Debtor is

limited to that which is identified in the agreement, that Counsel is not required to represent the Debtor in any bankruptcy proceeding following or resulting from the involuntary case, and that in the absence of a separate agreement to do so, Counsel is not required to undertake any representation of the debtor in bankruptcy beyond that of the involuntary. The client agreement also states:

Legal Representation by Busch Ruotolo & Simpson, LLP of Jeffrey Baron to defend the Client against an involuntary bankruptcy petition in the related adversary proceeding styled In re Jeffrey Baron, now pending before the United States Bankruptcy Court for the Northern District of Texas, Dallas Division, Case No. 12-37921-SGJ, but not representation of the Debtor in the event an order for relief is entered under 11 U.S.C. Section 362.

3. On June 26, 2013, this Court entered its Findings and Conclusions concerning the trial of the involuntary bankruptcy case, and entered an Order for Relief [see Docket Nos. 239 and 240], thus ending and terminating Counsel's agreed engagement.

4. Inasmuch as the engagement between Counsel and the Alleged Debtor has ended by its terms, and inasmuch as Counsel did not agree to represent Mr. Baron in bankruptcy (nor did he agree for Counsel to serve in that capacity), withdrawal is probably unnecessary. Nonetheless, in an abundance of propriety and clarity, Counsel seeks official leave to withdraw as counsel for Mr. Baron this cause for the reasons stated.

WHEREFORE, PREMISES CONSIDERED, Counsel of record for Jeffrey Baron, respectfully pray that on final hearing hereof, this Court enter an order granting Counsel leave to withdraw as counsel of record in this cause, and granting such other and further relief to which Counsel may be justly entitled.

Respectfully submitted,

Busch, Ruotolo & Simpson, L.L.P.

By: /s/ Alan L. Busch

Alan L. Busch

State Bar No. 19408830

Christopher M. Albert

State Bar No. 24008550

CERTIFICATE OF SERVICE

I hereby certify that on June 28, 2013, a true and correct copy of the foregoing document was sent by email to Jeffrey Baron; Lisa Lambert, Counsel for the United States Trustee; Gerrit Pronske, Counsel for the Petitioning Creditors, and upon all persons requesting notices via the ECF system.

/s/ Alan L. Busch

Alan L. Busch