

EXHIBIT D 4

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**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

In re: §
§
ONDOVA LIMITED COMPANY, § **CASE NO. 09-34784-SGJ-11**
§
Debtor. § **Chapter 11**

**MOTION FOR EXPEDITED HEARING ON EMERGENCY MOTION
TO WITHDRAW AS ATTORNEY OF RECORD FOR JEFFREY BARON**

TO THE HONORABLE STACEY G. C. JERNIGAN,
UNITED STATES BANKRUPTCY JUDGE:

Pronske & Patel, P.C. (“PronskePatel”), pursuant to Section 105 of the United States Bankruptcy Code, 11 U.S.C. §§ 101 *et. seq.* (the “Bankruptcy Code”), seeks an order from the Court setting an expedited hearing on *Emergency Motion to Withdraw as Attorney of Record for Jeffrey Baron* [Docket No. 419] (the “Motion to Withdraw”). In support of this Motion, PronskePatel respectfully represents as follows:

I. JURISDICTION AND VENUE

1. The Court has jurisdiction over the Motion pursuant to 28 U.S.C. §§ 157 and 1334(b). This matter is a core proceeding and this Motion is proper in this district pursuant to 28

U.S.C. §§ 1408 and 1409.

2. The statutory basis for relief requested herein is Section 105 of the Bankruptcy Code.

II. BACKGROUND

3. On July 27, 2009 (the "Petition Date"), the Debtor filed for bankruptcy protection under chapter 11 of title 11 of the Bankruptcy Code.

4. On September 17, 2009, the Court entered an order approving the appointment of a chapter 11 trustee (Docket No. 98).

III. RELIEF REQUESTED

5. As more fully set forth in the Motion to Withdraw, PronskePatel hereby seeks formal withdrawal as attorneys of record for Jeffrey Baron in the above-referenced bankruptcy action.

6. Expedited consideration of the Motion to Withdraw is warranted by the impending time-sensitive issues in this case. Upon information and belief, PronskePatel has recently learned that Mr. Baron intends to transfer assets to an offshore entity over which U.S. Courts will not have jurisdiction, in order to hide those assets from legitimate creditors. Upon information and belief, Mr. Baron will be transferring such assets around September 15, 2010. In order to pursue state court remedies against such assets and to comply with all ethical obligations, PronskePatel must withdraw as counsel of record for Mr. Baron by September 15, 2010. Thus, PronskePatel must respectfully request that the Court grant relief on an expedited basis, so that PronskePatel may withdraw prior to the transfer of assets by Mr. Baron. Accordingly, PronskePatel respectfully requests a hearing on the Motion to Withdraw on an expedited basis, on or before September 15, 2010. Specifically, PronskePatel requests that this

matter be set before or at the same time as the expedited status conference currently set in this case on September 15, 2010 at 1:30 p.m. [Docket No. 22].

7. PronskePatel has recently learned that Baron intends to hide his assets offshore as early as September 15, 2010. Thus, the hearing will need to move forward expeditiously to prevent Mr. Baron's unlawful activities.

8. Notice of the proposed emergency hearing will be provided to the Trustee, Mr. Baron, counsel for Mr. Baron, and all parties requesting notice.

WHEREFORE, PREMISES CONSIDERED, PronskePatel respectfully requests the Court enter an order expediting the hearing on the Motion to Withdraw and granting such other and further relief, whether in law or in equity, as the Court may deem proper.

Dated: September 9, 2010

Respectfully submitted

By: /s/ Gerrit M. Pronske
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CERTIFICATE OF CONFERENCE

I, the undersigned, hereby certify that on September 8, 2010 I conferred with Gary Lyon, counsel for Mr. Baron, regarding the relief requested in the Motion. Mr. Lyon indicated that Mr. Baron is unopposed to the expedited setting. I further certify that on September 9, 2010, I conferred with Raymond Urbanik, counsel for the Trustee, regarding the relief requested, and Mr. Urbanik indicated that he is unopposed to the expedited setting.

/s/ Gerrit M. Pronske
Gerrit M. Pronske

CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that on September 9, 2010 I caused to be served the foregoing pleading upon all parties registered to receive electronic notice via the Court's electronic transmission facilities.

/s/ Gerrit M. Pronske
Gerrit M. Pronske