UNITED STATES BANKRUPTCY COURT DISTRICT OF CONNECTICUT BRIDGEPORT DIVISION

ERICA LAFFERTY; DAVID WHEELER; FRANCINE WHEELER; JACQUELINE BARDEN; MARK BARDEN; NICOLE HOCKLEY; IAN HOCKLEY; JENNIFER HENSEL; JEREMY RICHMAN; DONNA SOTO; CARLEE SOTO-PARISI; CARLOS M. SOTO; JILLIAN SOTO; AND WILLIAM ALDENBERG, Plaintiffs,

ADV. PROC. NO. 22-05004

May 9, 2022

and MIDAS RESOURCES, INC.,

Defendants.

FREE SPEECH SYSTEMS, LLC; INFOWARS HEALTH, LLC; PRISON PLANET TV, LLC; WOLFGANG

ALEX EMRIC JONES; INFOWARS, LLC;

HALBIG; CORY T. SKLANKA; GENESIS COMMUNICATIONS NETWORK, INC.;

MOTION TO WITHDRAW AS COUNSEL

Pursuant to Local Bankr. R. 9083-4 and D. Conn. L. Civ. R. 7(e), the undersigned respectfully moves for permission to withdraw as counsel for Defendants Alex Jones, Free Speech Systems, InfoW, LLC (f/k/a Infowars, LLC), IWHealth, LLC (f/k/a Infowars Health, LLC), and Prison Planet TV, LLC. To the extent that Attorneys Norman A. Pattis,¹ Kevin M. Smith, and Zachary Reiland and the law firm of Pattis & Smith, LLC have

¹ Attorney Pattis was formerly lead counsel in this matter for the Defendants. Due to difficulties in processing his e-filing registration for this court, he did not file a formal appearance despite signing initial pleadings, but the undersigned represents that, to the best of his knowledge, Attorney Pattis is a member of the District of Connecticut's bar in good standing.

appeared in the underlying action and their apperances are recognized in this matter, the undersigned respectfully moves that the Court include them in its order granting this motion to withdraw as all are members of the law firm of Pattis & Smith, LLC.

In support of this motion, the undersigned represents as follows:

1. I am an attorney with the law firm of Pattis & Smith, LLC duly licensed to practice law before all Connecticut state and federal courts.

2. I represented Defendants Alex Jones, Free Speech Systems, InfoW, LLC (f/k/a Infowars, LLC), IWHealth, LLC (f/k/a Infowars Health, LLC), and Prison Planet TV, LLC in the Connecticut state civil action that was removed to this Court by virtue of a personal appearance in addition to my firm's formal appearance.

3. Per Connecticut practice, Attorneys Norman A. Pattis, Kevin M. Smith, and Zachary Reiland also represented Defendants Alex Jones, Free Speech Systems, InfoW, LLC (f/k/a Infowars, LLC), IWHealth, LLC (f/k/a Infowars Health, LLC), and Prison Planet TV, LLC by virtue of an appearance on behalf of our law firm, Pattis & Smith, LLC.

4. The Defendants Alex Jones, Free Speech Systems, InfoW, LLC (f/k/a Infowars, LLC), IWHealth, LLC (f/k/a Infowars Health, LLC), and Prison Planet TV, LLC have discharged the undersigned, his colleagues, and the law firm of Pattis & Smith, LLC.

5. Pursuant to Connecticut Rule of Professional Conduct 1.16(a)(3), the undersigned and his colleagues' withdrawal is mandatory.

6. The undersigned and his colleagues have provided the Defendants' Texas counsel with referrals to competent members of the Court's bar and Connecticut's bar to replace them.

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7. The undersigned and his colleagues' motion to withdraw does not violate the automatic stay imposed by the Bankruptcy Code (11 U.S.C. § 362 *et seq.*) because it is not a proceeding "against the debtor."

Thus, the undersigned respectfully requests the Court to grant the motion to withdraw.²

Date: May 9, 2022

Respectfully Submitted,

By: <u>/s/ Cameron L. Atkinson /s/</u> Cameron L. Atkinson (ct31219) PATTIS & SMITH, LLC 383 Orange Street New Haven, CT 06511 V: 203-393-3017 F: 203-393-9745 <u>catkinson@pattisandsmith.com</u>

² Judge Barbara Bellis of the Connecticut Superior Court previously issued an order in this case directing counsel to file motions to withdraw their appearance if they became necessary instead of simply having successor counsel file in lieu of appearances as is permissible under Connecticut practice.

CERTIFICATE OF SERVICE

I hereby certify that on the date of filing, a true and correct copy of the foregoing document was served by U.S.P.S. and, where indicated, email on the following parties:

Attn: Eric Goldstein, Jessica M. Signor Shipman & Goodwin LLP One Constitution Plaza Hartford, CT 06013 egoldstein@goodwin.com jsignor@goodwin.com

Attn: Alinor C. Sterlin, Christopher Mattei, Matthew Blumenthal Koskoff Koskoff & Bieder 350 Fairfield Avenue Bridgeport, CT 06604 <u>asterling@koskoff.com</u> <u>cmattei@koskoff.com</u> mblumenthal@koskoff.com

Attn: Kyung Lee, R. J. Shannon Parkins Lee & Rubio LLP 700 Milam Street STE 1300 <u>klee@parkinslee.com</u> rjshannon@parkinslee.com

Attn: Eric Henzy Zeisler & Zeisler P.C. 10 Middle Street, 15th Floor Bridgeport, CT 06604 <u>ehenzy@zeislaw.com</u> Attn: Mario Kenneth Cerame Brignole & Bush LLC 73 Wasworth Street Hartford, CT 06106 <u>mcerame@brignole.com</u>

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Attn: Ray Bataglia Law Office of Ray Battaglia, PLLC 66 Granburg Circle San Antonio, TX rbattaglialaw@outlook.com

Genesis Communications Network, Inc. Attn. Officer, Managing Agent or Agent for Service 190 Cobblestone Lane Burnsville, MN 55337

The undersigned further certifies that a copy of this motion was served on the Defendants Alex Jones, Free Speech Systems, InfoW, LLC (f/k/a Infowars, LLC), IWHealth, LLC (f/k/a Infowars Health, LLC), and Prison Planet TV, LLC by priority U.S. mail. Out of respect for the Defendants' oft-stated interests, the undersigned does not list their addresses.

<u>/s/ Cameron L. Atkinson /s/</u> Cameron L. Atkinson