

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

GM CASTING HOUSE INC.,

Plaintiff,

v.

FOREVER COMPANIES, INC.

Defendant.

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Case No. 1:24-cv-1821

Jury Trial Demanded.

**MOTION TO WITHDRAW
AS COUNSEL FOR DEFENDANT, FOREVER COMPANIES, INC.**

NOW COMES attorney Edmund J. Ferdinand, III of the law firm Meister Seelig & Fein PLLC (“Movant”) pursuant to Local Rules 83.17 and 83.39, and hereby requests withdrawal as counsel for Defendant Forever Companies, Inc., (“Defendant”). In support hereof, Movant states as follows:

1. On October 7, 2024, Attorney Ferdinand filed an application to appear in this matter *pro hac vice* at the request of Defendant’s Interim Restructuring Officer, Lindsey Saletta, for the express purpose that Attorney Ferdinand could participate in the mediation settlement conference before the Honorable Young B. Kim on October 8, 2024. The mediation was unsuccessful and the case remains pending.

2. Defendant is aware that the case remains pending before the Honorable Jeffrey I. Cummings, that written discovery is outstanding, and that Magistrate Judge Young Kim has offered additional assistance with settlement efforts.

3. Nevertheless, Defendant has been on the verge of insolvency for several months, and the efforts of the Interim Restructuring Officer have been focused on those efforts. As a result, Defendant has not complied with its discovery obligations. During this time, Defendant has not

communicated with Attorney Ferdinand other than to advise on the status of the insolvency, and Defendant has not paid the legal bills of Meister Seelig & Fein.

4. On January 27, 2025, Attorney Ferdinand was informed by Ms. Saletta that the company's bank is on the verge of foreclosing and the company will soon be insolvent; and that the company approves of the withdrawal of Attorney Ferdinand as attorney of record and they understand that a default will issue in this case against the company.

This request is being made pursuant to L.R. 83.39 as Defendant has requested the withdrawal of Meister Seelig & Fein as Defendant's counsel. The request for withdrawal is for financial reasons.

WHEREFORE, Movants Edmund J. Ferdinand III and the Law Firm of Meister Seelig & Fein PLLC requests that this Court enter an order permitting their withdrawal as attorneys for Defendant, Forever Companies, Inc. in this case, and for such other and further relief as the Court deems just and proper.

Dated: January 30, 2025

Respectfully submitted,

/s/ Edmund J. Ferdinand III
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Admitted *Pro Hac Vice*

Attorneys for Defendant Forever Companies

CERTIFICATE OF SERVICE

The undersigned counsel states that a copy of the foregoing **Motion to Withdraw as Counsel for Defendant** was filed with the United States District Court for the Northern District of Illinois using the CM/ECF system on January 30, 2025, which will send notification of such filings to all parties of record.

By: /s/ Edmund J. Ferdinand III
One of the Attorneys for Defendant