

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

IN RE:	§	CHAPTER 11
ALEXANDER E. JONES	§	CASE NO. 22-33553 (CML)
Debtor.	§	
	§	
	§	
	§	

MOTION TO WITHDRAW AS ATTORNEY OF RECORD FOR DEBTOR

THIS MOTION SEEKS AN ORDER THAT MAY ADVERSELY AFFECT YOU. IF YOU OPPOSE THE MOTION, YOU SHOULD IMMEDIATELY CONTACT THE MOVING PARTY TO RESOLVE THE DISPUTE. IF YOU AND THE MOVING PARTY CANNOT AGREE, YOU MUST FILE A RESPONSE AND SEND A COPY TO THE MOVING PARTY. YOU MUST FILE AND SERVE YOUR RESPONSE WITHIN 21 DAYS OF THE DATE THIS WAS SERVED ON YOU. YOUR RESPONSE MUST STATE WHY THE MOTION SHOULD NOT BE GRANTED. IF YOU DO NOT FILE A TIMELY RESPONSE, THE RELIEF MAY BE GRANTED WITHOUT FURTHER NOTICE TO YOU. IF YOU OPPOSE THE MOTION AND HAVE NOT REACHED AN AGREEMENT, YOU MUST ATTEND THE HEARING. UNLESS THE PARTIES AGREE OTHERWISE, THE COURT MAY CONSIDER EVIDENCE AT THE HEARING AND MAY DECIDE THE MOTION AT THE HEARING.

REPRESENTED PARTIES SHOULD ACT THROUGH THEIR ATTORNEY.

TO THE HONORABLE CHRISTOPHER M. LOPEZ,
UNITED STATES BANKRUPTCY JUDGE:

Vickie L. Driver and Christina W. Stephenson with Elliott, Thomason & Gibson, LLP (“Movants” or “ETG”) hereby submits this *Motion to Withdraw as Attorney of Record* (the “Motion”) for Alexander E. Jones (the “Debtor”) in the above-referenced Chapter 7 case, and in support thereof, would show 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.

II. BACKGROUND

3. On December 2, 2022, debtor Alexander E. Jones (“Jones” and together with FSS, the “Debtors”) filed a voluntary petition for relief under chapter 11 of the Bankruptcy Code before this Court. On June 14, 2024, the case was converted to one under Chapter 7.

4. As of November 1, 2024, the Defendant and counsel determined that representation by the Movants would terminate, and the undersigned agreed to withdraw, leaving Shelby A. Jordan with Jordan & Ortiz, PC, 500 N. Shoreline Blvd., Suite 804, Corpus Christi, Texas 78401, continuing representation of Debtor in this case. As such, withdrawal of ETG as counsel to Debtor will not unduly delay or disrupt this case, nor will withdrawal cause prejudice to the Debtor.

III. RELIEF REQUESTED

5. ETG, Ms. Driver and Mrs. Stephenson hereby seek formal withdrawal as attorneys of record for Debtor in the above-referenced case.

6. The granting of the relief requested in this Motion will not prejudice any of the parties in this Chapter 7 case.

WHEREFORE, PREMISES CONSIDERED, Movants respectfully request that the Court grant this Motion; authorize the immediate withdrawal of ETG, Ms. Driver and Mrs. Stephenson as counsel for the Debtor; and for such other and further relief to which the Movants have shown themselves to be entitled.

Dated: November 25, 2024.

Respectfully submitted,

ELLIOTT, THOMASON & GIBSON, LLP

By: /s/ Vickie L. Driver

Vickie L. Driver

State Bar No. 24026886

Christina W. Stephenson

State Bar No. 24049535

511 N. Akard St. Suite 202

Dallas, TX 75201

Telephone: 469.809.6730

Email: vickie@etglaw.com

Email: crissie@etglaw.com

ATTORNEYS FOR ALEXANDER E. JONES

CERTIFICATE OF SERVICE

A true and correct copy of the foregoing document was filed with the Court on November 25, 2024, and served electronically upon those parties registered to receive electronic notice via the Court's CM/ECF system.

/s/ Vickie L. Driver

Vickie L. Driver