UNITED STATES BANKRUPTCY COURT FOR THE NORTHERN DISTRICT OF ILLINOIS WESTERN DIVISION

IN RE:)	
)	
PAUL R. DULBERG)	No. 14-83578
)	
)	
Debtor.)	Judge Thomas M. Lynch

NOTICE OF MOTION TO WITHDRAW AS COUNSEL

Megan G. Heeg, on behalf of the law firm of Ehrmann Gehlbach Badger Lee & Considine, LLC, has filed papers with the Court regarding a motion to withdraw as counsel for the Bankruptcy Estate. A copy of said Motion referred to herein is available for inspection at the offices of the Clerk of the U.S. Bankruptcy Court or at the offices of Ehrmann Gehlbach Badger Lee & Considine, LLC during usual business hours.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)

If you do not want the Court to grant the Motion and want the Court to consider your views on said Motion, then you or your attorney must:

- File a written response to the above Motion on or before the date set for the hearing on the Motion at the United States Bankruptcy Court, 327 South Church Street, Rockford, IL 61101; OR,
- Attend the hearing scheduled to be held on November 2, 2016, at 9:30 a.m. at the United States Bankruptcy Court, Courtroom 3100, 327 South Church Street, Rockford, IL 61101.

If you mail your response to the Court for filing, you must mail it early enough so that the Court will receive it on or before the date stated above.

You must also mail a copy to:

Attorney Megan G. Heeg

Ehrmann Gehlbach Badger Lee & Considine, LLC

215 E. First Street P.O. Box 447 Dixon, IL 61021

If you file a response, attend the hearing on the Motion, scheduled to be held on November 2, 2016, at 9:30 a.m. at the United States Bankruptcy Court, Courtroom 3100, 327 South Church Street, Rockford, IL 61101.

If you or your attorney do not take these steps, the Court may decide that you do not oppose the Motion and grant the same.

Dated: October 6, 2016

/s/ Megan G. Heeg
Attorney Megan G. Heeg
Ehrmann Gehlbach Badger Lee & Considine, LLC
215 E. First Street
P.O. Box 447
Dixon, IL 61021

STATE OF ILLINOIS

)
SS. PROOF OF SERVICE

COUNTY OF LEE

The undersigned, being first duly sworn on oath, deposes and says that she served the within document upon the parties on the attached matrix, by placing a true and correct copy of said document in an envelope, each addressed as is shown above. (Except for the documents to the U.S. Trustee's office and Debtor's attorney, which should have been served electronically by the Bankruptcy Court).

That she sealed said envelopes and placed sufficient U.S. postage on each; that she deposited said envelopes so sealed and stamped in the United States Mail at Dixon, Illinois, at or about the hour of 5:00 o'clock P.M. on the 6th day of October, 2016.

/s/ Katherine M. Elliott

Megan G. Heeg
Ehrmann Gehlbach Badger Lee & Considine, LLC
215 E. First Street, Suite 100
P.O. Box 447
Dixon, IL 61021
(815) 288-4949
(815) 288-3068 (FAX)
heeg@egblc.com

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Page: 1

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Creditor Mailing Matrix

Case No.: 14-83578

Alexian Brothers Medical Group PO Box 5588 Belfast ME 04915-5500 Associated Neurology SC 1800 Hollister Drive Sulte 250 Bank of America PO Box 851001 Dallas TX 75285-1001 BANK OF AMERICA PO Box 982238 BL PASO TX 79998-2238 Bank of America PO Box 982235 Bank of America PO Box 982235 Bank of America PO Box 82609 Capital One Bank Attn: General Correspondence PO Box 30285 Capital One Bank (USA), N.A. PO Box 71083 David L. Stretch David L. St	Name	Address	City	State	Zip
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Suite 700	Oak Trust Credit Union	444 N Eola Rd, Suite 101	Aurora	IL	60502-9620
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	Patrick S Layng		Madison	WI	53715-2635
J.S. Bankruptcy Court Western Division Rockford IL 61101-1320	Paul R Dulberg	4606 Hayden Court	McHenry	IL	60051-7918
	U.S. Bankruptcy Court	Western Division	Rockford	IL	61101-1320

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Creditor Mailing Matrix

Page: 2

Case No.: 14-83578

Name	Address	City	State	Zip
	327 South Church Street			
Walgreens	3925 W. Elm Street	McHenry	IL	60050-4361
Walmart Pharmacy	3801 Running Brook Farms Boulevard	Johnsburg	IL	60051-5425
WORLD'S FOREMOST BANK	CABELA'S CLUB VISA PO BOX 82609	LINCOLN	NE	68501-2609
Worlds Foremost Bank NA	4800 NW 1st Street Suite 300	Lincoln	NE	68521-4463

Total: 33

UNITED STATE BANKRUPTCY COURT NORTHERN DISTRICT OF ILLINOIS WESTERN DIVISION

IN RE:)	
)	
PAUL R. DULBERG)	No. 14-83578
)	
Debtor.)	Judge Thomas M. Lynch

MOTION TO WITHDRAW AS COUNSEL

NOW COMES Ehrmann Gehlbach Badger Lee & Considine, LLC, by Megan G. Heeg, and for its Motion to Withdraw as Counsel for the Paul Dulberg Bankruptcy Estate, states as follows:

- This Motion is filed pursuant to local Bankruptcy Rule 2091-1.
- Previously, Megan G. Heeg, had been appointed the Chapter 7 case Trustee of the above-referenced case.
- On May 27, 2015, this Court approved the Trustee's motion to employ the law firm of Ehrmann Gehlbach Badger Lee & Considine, LLC to represent the Estate.
- 4. Megan G. Heeg is retiring at the end of the year, and therefore, on August 31, 2016, Megan G. Heeg filed her Notice of Resignation and thereafter, the United States Trustee appointed Joseph D. Olsen to serve as Trustee of the Paul R. Dulberg Estate.
- 5. Recently, this Court approved Trustee Olsen's Motion to employ himself and his firm to represent the Estate.
- For the reasons stated above, Ehrmann Gehlbach Badger Lee & Considine, LLC,
 files this Motion to Withdraw as Counsel, and asks that this Court enter an order, granting this
 motion to withdrawal as counsel.

WHEREFORE, Ehrmann Gehlbach Badger Lee & Considine, LLC, by its attorney,

Megan G. Heeg, asks that this Court grant this Motion to Withdraw as Counsel, and that this Court

grant to movant such other and further relief as it deems just and proper.

/ Megan G. Heeg
Attorney Megan G. Heeg
Ehrmann Gehlbach Badger Lee & Considine, LLC
215 E. First Street
P.O. Box 447
Dixon, IL 61021

Megan G. Heeg
Ehrmann Gehlbach Badger Lee & Considine, LLC
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