

**IN THE UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

IN RE:) **CHAPTER 7**
)
CLAUDIO PABLO AVENDANO,) **CASE NO. A15-64523-PWB**
)
Debtor.)

**MOTION TO WITHDRAW AS COUNSEL
WITH CONSENT BY DEBTOR PERMITTING WITHDRAWAL**

COMES NOW, Richard K. Valdejuli, Jr., (“Valdejuli”) hereby moves to withdraw as counsel of record for the above-named Debtor (the “Motion”). In support of this Motion, Counsel shows the Court as follows:

1.

Debtor filed this instant case, *pro se*, on August 3, 2015.

2.

On or about October 20, 2015, Debtor retained Valdejuli to represent him in converting his Chapter 7 case to Chapter 13.

3.

Valdejuli filed a Notice of Appearance as counsel for Debtor on October 25, 2015 (Doc No. 20) and remains attorney of record as of the date of this Motion.

4.

Debtor desires to proceed *pro se* in this Chapter 7 case or may seek to retain another attorney.

5.

Debtor’s desire for Valdejuli to withdraw as counsel of record is predicated on implications from his secured creditors that the parties may be able to reach a settlement

of its claims without the need to sell creditors' collateral located at 155 Liberty Road, Villa Rica, GA.

6.

Debtor understands and acknowledges that by his request for Valldejuli to withdraw as counsel and by Valldejuli's consent to do so, does not constitute a waiver of Valldejuli's entitlement to compensation for his representation for the period of October 20, 2015 through and including August 24, 2016 upon proper Application, Notice and approval by the Court.

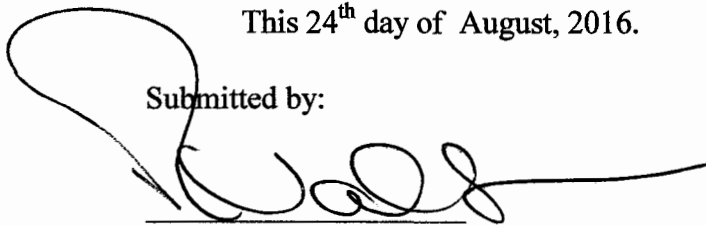
7.

Debtor acknowledges that he will have the burden of keeping the Court informed respecting where notices, or other papers may be served; that he has the responsibility to prepare for the any and all hearings in this case and to hire other counsel to represent them and that by failing or refusing to meet any of these burdens, he may suffer adverse consequences.

WHEREFORE, based on the foregoing, Richard K. Valldejuli, Jr. respectfully requests that such Order permitting his withdrawal as counsel for the Debtor be entered in this case.

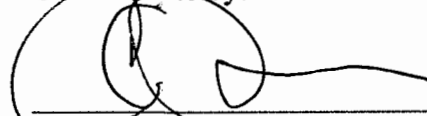
This 24th day of August, 2016.

Submitted by:



Richard K. Valldejuli, Jr.
GA. State Bar #723225
Attorney for Debtor
2199 Lenox Road, Suite A
Atlanta, GA 30324
(404) 636-9957

Consented to by:



CLAUDIO PABLO AVENDANO
Debtor
P.O. Box 401
Winston, GA 30187
(404) 520-3333

CERTIFICATE OF SERVICE

This is to certify that I have this day served all parties in the foregoing matter with a true and correct copy of the foregoing ***MOTION TO WITHDRAWAL AS COUNSEL FOR DEBTOR*** by ECF Transmission and/or by depositing in the United States Mail, a copy of same in a property addressed envelope with adequate postage thereon upon:

David S. Weidenbaum
Office of the U.S. Trustee
362 Richard B. Russell Bldg.
75 Ted Turner Drive, SW
Atlanta, GA 30303

Neil C. Gordon
Arnall Golden Gregory LLP
Suite 2100
171 17th Street, NW
Atlanta, GA 30363

Brandi L. Kirkland
Mary Ida Townson, Ch. 13 Trustee
Suite 2200
191 Peachtree Street, NE
Atlanta, GA 30303-1740

Victor J. Harrison
Harrison & Horan, P.C.
Suite 101
3150 Golf Ridge Boulevard
Douglasville, GA 30135

This 24th day of August, 2016..

_____/s/_____
Richard K. Valldejuli, Jr.
GA State Bar #723225

Valldejuli & Associates, LLC
2199 Lenox Road, Suite A
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