

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF WEST VIRGINIA

In re:

PANTHERA ENTERPRISES, LLC,

Debtor.

Case No. 2:19-bk-00787
Chapter 7

**MOTION TO WITHDRAW AS COUNSEL OF
RECORD FOR PANTHERA TRAINING, LLC**

COMES NOW, Julia A. Chincheck, Zachary J. Rosencrance, and Michael R. Proctor, and the law firm of Bowles Rice LLP, attorneys for Panthera Training, LLC (“Panthera”) in the above-referenced bankruptcy case, and moves this Honorable Court pursuant to Rule 1.16 (Declining or Terminating Representation) of the West Virginia Rules of Professional Conduct and pursuant to Local Rule 2091-1 (Attorneys – Withdrawals) of the United States Bankruptcy Court for the Northern District of West Virginia Local Rules, all notification requirements have been met.

1. The law firm of Bowles Rice was retained by Panthera on October 8, 2019, to represent it in connection with the bankruptcy case of Panthera Enterprises, LLC. According to the retention agreement, Bowles Rice reserved the right to withdraw its representation if timely payments were not made.

2. Bowles Rice has contacted Panthera on numerous occasions via telephone and email to collect monies due for unpaid legal fees. Panthera indicated that they would be sending payment to Bowles Rice. As of this filing, no payments have been received.

3. Panthera is aware of Bowles Rice LLP's intention to withdraw from this bankruptcy proceeding.

4. Here, based upon good cause shown, counsel seek and order from this Court relieving Julia A. Chincheck, Zachary J. Rosencrance, and Michael R. Proctor, and the law firm of Bowles Rice LLP of their obligation to serve as counsel for Panthera in the above-referenced bankruptcy case.

5. Counsel have served Panthera a copy of this Motion.

6. Panthera's last known mailing address and telephone number is as follows:

Panthera Training, LLC
c/o Robert Starer
Post Office Box 981
Old Fields, West Virginia 26845
Telephone: 304-530-5555

7. Pursuant to Local Rule 2091, all notification requirements have been met.
See, Written Certification attached hereto as Exhibit A.

WHEREFORE, the undersigned counsel prays for an Order from this Honorable Court granting Julia A. Chincheck, Zachary J. Rosencrance, and Michael R. Proctor, and the law firm of Bowles Rice LLP, leave to withdraw as counsel for Panthera Training, LLC in the above-

referenced bankruptcy proceeding, and for such other relief as this Honorable Court deems just and proper.

PANTHERA TRAINING, LLC

By Counsel

/s/ Zachary J. Rosencrance

Zachary J. Rosencrance (WVSB #13040)

Michael J. Proctor (WVSB #9122)

BOWLES RICE LLP

600 Quarrier Street, Post Office Box 1386

Charleston, West Virginia 25325-1386

Telephone: (304) 347-1100

Facsimile: (304) 343-3058

E-mail: zrosencrance@bowlesrice.com

E-mail: mproctor@bowlesrice.com

EXHIBIT A

IN THE UNITED STATES BANKRUPTCY COURT
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PANTHERA ENTERPRISES, LLC,

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WRITTEN CERTIFICATION

1. Pursuant to Local Rule 2091-1(c)(1)-(8), Bowles Rice LLP has made all required noticed thereunder via email correspondence sent to Douglas Kahle c/o Panthera Training, LLC.

2. Additionally, Bowles Rice LLP has advised Panthera Training that the effective date of Bowles Rice LLP's withdrawal begins upon entry of an order granting the Motion to Withdraw as Counsel.

3. Bowles Rice LLP attempted to follow up via telephone to confirm receipt of the email correspondence; however, as of August 9, 2024 Bowles Rice LLP has been unable to make direct contact with Panthera Training, LLC.

PANTHERA TRAINING, LLC

By Counsel

/s/ Zachary J. Rosencrance

Zachary J. Rosencrance (WVSB #13040)

Michael J. Proctor (WVSB #9122)

BOWLES RICE LLP

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Charleston, West Virginia 25325-1386

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CERTIFICATE OF SERVICE

I, Zachary J. Rosencrance, do hereby certify that a true and correct copy of the **Motion to Withdraw as Counsel of Record for Panthera Training, LLC** and proposed **Order Granting Motion to Withdraw as Counsel of Record for Panthera Training, LLC** have been served on all parties registered to receive notices by the Court's ECF System in this case, on this the 12th day of August, 2024.

The undersigned, counsel of record for Panthera Training, LLC, does hereby further certify on this 12th day of August, 2024, that a true copy of the foregoing **Motion to Withdraw as Counsel of Record for Panthera Training, LLC** and proposed **Order Granting Motion to Withdraw as Counsel of Record for Panthera Training, LLC** was served upon Panthera Training, LLC, at the following address:

Panthera Training, LLC
c/o Robert Starer
Post Office Box 981
Old Fields, West Virginia 26845

/s/ Zachary J. Rosencrance
Zachary J. Rosencrance (WVSB #13040)