

**CAUSE NO. 2016-33668**

NKEOMA BRENDA EZENAGU	§	IN THE DISTRICT COURT OF
	§	
Plaintiff,	§	
	§	
vs.	§	HARRIS COUNTY, TEXAS
	§	
OLUSHEGUN OLAGUNDOYE AND	§	
KINGHAVEN COUNSELING GROUP	§	
	§	
Defendants.	§	151st JUDICIAL DISTRICT

**(OPPOSED) MOTION TO WITHDRAW AS DEFENDANT KINGHAVEN'S ATTORNEY**

TO THE HONORABLE JUDGE OF THIS COURT:

**COMES NOW Attorney Patrick Chukelu who moves to withdraw as counsel to Kinghaven Counseling Group, Inc.'s attorney** (Defendant Client hereinafter referred to as "Kinghaven") and for good cause of action would show the Court as follows:

**I.**

**WITHDRAWAL NOT SOUGHT FOR DELAY**

1. Movant (Counsel to the Defendant) have unresolved major disagreement(s) that precludes or substantially impairs Counsel's ability to continue representation of this corporate Defendant. Details are excluded to preserve attorney-client privilege.
2. Written Notice of this Counsel's intent to withdraw had been disclosed to the Client prior to this filing. The Client is opposed to Movant's withdrawal as its Counsel. No response was received to enable Movant ascertain whether Defendant or its new counsel desires continuance or has adequate time to proceed with the trial of this cause set for the week of February 19, 2018.
3. Client admonitions under Tex. R. Civ. Proc. Rule 10 advising Client that it is a

corporation and must be represented by an Attorney has been given to Client prior to filing this Motion to Withdraw.

4. A copy of this Motion is contemporaneously being served on Defendant Kinghaven to apprise Defendant Kinghaven that it has the right to oppose this Counsel's Motion to Withdraw. The Corporate Defendant is again herein notified that it must be represented by an attorney and may not proceed *pro se*.

## **II.**

### **DEFENDANT'S LAST KNOWN CONTACT**

5. Defendant Kinghaven's last known address and telephone number are as follows: 6315 Gulfport Street, Suite 100, Houston, Texas 77081. Telephone 713-457-4372

## **III.**

### **PRAYER**

**WHEREFORE PREMISES CONSIDERED,** Attorney for Defendant Kinghaven prays that the Court grant this his Motion to Withdraw as Counsel for Defendant Kinghaven and request other remedies Movant may be justly entitled.

Respectfully submitted,

**LAW OFFICE OF PATRICK CHUKELU**

/S/ Patrick Chukelu

Patrick Chukelu

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ATTORNEY FOR DEFENDANT,

Kinghaven Counseling Group, Inc

### **CERTIFICATE OF CONFERENCE**

Defendant Kinghaven is opposed to this Motion and the Motion should be considered as an opposed Motion for adjudication purposes.

/s/ Patrick Chukelu

### **CERTIFICATE OF SERVICE**

I certify that, on November 28, 2017, I e-served a true and correct copy of the foregoing Motion to Withdraw, Notice of Submission and a Proposed Order through the Court filing e-serve To:

- 1 Attorney A. Sampson Gbenjo Fax: (713) ~~771~~-4784 (Email: [Anne@Gbenjolawgroup.com](mailto:Anne@Gbenjolawgroup.com))
2. Sean Greenwood Fax: 832. 356.1589 (Email: [sean@gwoodlaw.com](mailto:sean@gwoodlaw.com))
3. Defendant Kinghaven 's CEO by email

/s/ Patrick Chukelu