

“Defendants”), and hereby request to withdraw as counsel. In support thereof, Movants would show the following:

I.

Good cause exists for Movants’ withdrawal from representation of Surety Marketing, LLC, David Goldenberg, DAG Investments, LLC, LPG Investments, LLC and WED Marketing, LLC due to the death of David Goldenberg on or about October 14, 2007. Mr. Goldenberg has directed the defense of himself and the Defendant entities, as manager of Surety Marketing, LLC, DAG Investments, LLC, LPG Investments, LLC and WED Marketing, LLC. No client contact has been located to direct the defense of the Defendant Entities. Therefore, counsel for Defendants has been left without a client representative or authority to act on behalf of Defendants.

Additionally, prior to the death of Mr. Goldenberg, a dispute had arisen as to payment of fees and expenses. Defendants have exhausted retainer funds and have failed to replenish the retainer as requested. Therefore, Movants additionally seek to withdraw from representation of Defendants on this basis.

II.

Based on the death of Mr. Goldenberg, Movants have not been able to obtain Defendants’ consent to this Motion.

The last known address for Defendants is as follows:

Estate of David Goldenberg
3036 West Ridge Court
Bloomfield Hills, MI 48302

All communications for WED Marketing should also be directed to:

WED Marketing
Attn: Paula Cetean
1550 Drexal, #105
Miami Beach, FL 33139

III.

WHEREFORE, PREMISES CONSIDERED, Movants request this Honorable Court grant their Motion to Withdraw as Counsel for Surety Marketing, LLC, David Goldenberg, DAG Investments, LLC, LPG Investments, LLC and WED Marketing, LLC.

Respectfully submitted,

/s/ Kimberly Sims

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CERTIFICATE OF CONFERENCE

This shall certify that the undersigned spoke with counsel for MICHAEL J. QUILLING, Receiver for ABC VIATICALS, INC. on or about October 22, 2007 and November 13, 2007 regarding Movant's request to withdraw as counsel. Counsel for the Receiver indicated that he opposed withdrawal because Defendants would be without counsel which is required for such corporate entities. Therefore, Movants seek determination from the Court.

/s/ Kimberly Sims

Kimberly M. J. Sims

CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of the foregoing was served upon all counsel of record this 14th day of November, 2007, pursuant to the Federal Rules of Civil Procedure as follows:

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