

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:

1. 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,
2. 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

COUNTY OF LEE

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) SS. **PROOF OF SERVICE**  
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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 6<sup>th</sup> 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@egbic.com

**Creditor Mailing Matrix**

Case No.: 14-83578

| <u>Name</u>                          | <u>Address</u>                                               | <u>City</u>       | <u>State</u> | <u>Zip</u> |
|--------------------------------------|--------------------------------------------------------------|-------------------|--------------|------------|
| ABN AMRO Mortgage Group              |                                                              |                   |              |            |
| Alexian Brothers Medical Group       | PO Box 5588                                                  | Belfast           | ME           | 04915-5500 |
| Associated Neurology SC              | 1900 Hollister Drive<br>Suite 250                            | Libertyville      | IL           | 60048-5249 |
| Bank of America                      | PO Box 851001                                                | Dallas            | TX           | 75285-1001 |
| BANK OF AMERICA                      | PO BOX 982238                                                | EL PASO           | TX           | 79998-2238 |
| Bank of America                      | PO Box 982235                                                | El Paso           | TX           | 79998      |
| Cabelas Visa Center                  | World's Foremost Bank<br>PO Box 82609                        | Lincoln           | NE           | 68501-2609 |
| Capital One Bank                     | Attn: General Correspondence<br>PO Box 30285                 | Salt Lake City    | UT           | 84130-0285 |
| Capital One Bank (USA), N.A.         | PO Box 6492                                                  | Carol Stream      | IL           | 60197-6492 |
| Capital One Bank (USA), N.A.         | PO Box 71083                                                 | Charlotte         | NC           | 28272-1083 |
| David L. Stretch                     | Law Office of David L. Stretch<br>5447 West Bull Valley Road | McHenry           | IL           | 60050-7410 |
| Dr. Frank W. Sek                     | 4606 W. Elm Street                                           | McHenry           | IL           | 60050-4015 |
| Dynamic Hand Therapy & Rehab         | 498 S. US Highway 12<br>Suite C                              | Fox Lake          | IL           | 60020-1908 |
| Hand Surgery Associates, SC          | Dr. Sagerman / Dr. Biafora<br>515 W. Algonquin Road          | Arlington Heights | IL           | 60005-4405 |
| Joseph D Olsen                       | Yalden Olsen & Willette<br>1318 E State Street               | Rockford          | IL           | 61104-2228 |
| McHenry Radiologists & Imaging       | PO Box 220                                                   | McHenry           | IL           | 60051-0220 |
| MidAmerica Hand to Shoulder Clinic   | Dr. Talerico<br>75 Remittance Drive, Suite 6035              | Chicago           | IL           | 60675-6035 |
| Moraine Emergency Physicians         | PO Box 8759                                                  | Philadelphia      | PA           | 19101-8759 |
| Northern Illinois Medical Center     | 4201 Medical Center Drive                                    | McHenry           | IL           | 60050-8499 |
| Northwest Community Hospital         | 25709 Network Place                                          | Chicago           | IL           | 60673-1257 |
| Northwest Suburban Anesthesiologists | 8163 Solutions Center                                        | Chicago           | IL           | 60677-8001 |
| Oak Trust Credit Union               | 1 South 450 Summit Avenue                                    | Oakbrook Terrace  | IL           | 60181      |
| OAK TRUST CREDIT UNION               | 12251 S ROUTE 59                                             | PLAINFIELD        | IL           | 60585-9189 |
| Oak Trust Credit Union               | 444 N Eola Rd, Suite 101                                     | Aurora            | IL           | 60502-9620 |
| Oak Trust Credit Union               | 1814 W. Diehl Road<br>Suite 700                              | Naperville        | IL           | 60563      |
| Open Advanced MRI of Round Lake      | Medchex<br>PO Box 502                                        | Katonah           | NY           | 10536-0502 |
| Patrick S Layng                      | Office of the U.S. Trustee, Region 11<br>780 Regent St.      | Madison           | WI           | 53715-2635 |
| Paul R Dulberg                       | 4606 Hayden Court                                            | McHenry           | IL           | 60051-7918 |
| U.S. Bankruptcy Court                | Western Division                                             | Rockford          | IL           | 61101-1320 |

**Creditor Mailing Matrix**

Case No.: 14-83578

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

**Total: 33**

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IN RE:

PAUL R. DULBERG

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No. 14-83578  
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:

1. This Motion is filed pursuant to local Bankruptcy Rule 2091-1.
2. Previously, Megan G. Heeg, had been appointed the Chapter 7 case Trustee of the above-referenced case.
3. 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.
6. 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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