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8 UNITED STATES BANKRUPTCY COURT  
9 SOUTHERN DISTRICT OF CALIFORNIA

10 In re:

11 RAMPART MMW, INC.,  
12 Debtor.

) Case No.: 12-08724-MM11

)  
) APPLICATION BY THE LAW OFFICES OF  
) MONICA L. MONTGOMERY FOR LEAVE  
) TO WITHDRAW FROM  
) REPRESENTATION OF DEBTOR IN  
) POSSESSION RAMPART MMW, INC.

14  
15  
16 The application of Monica Montgomery, attorney for the Debtor in Possession Rampart MMW,  
17 Inc. ("Rampart") in the above captioned case, respectfully represents:

- 18  
19 1. On June 20<sup>th</sup>, 2012, Monica L. Montgomery, an attorney duly licensed to practice law in  
20 the State of California, filed a Chapter 11 Bankruptcy Petition on behalf of Rampart.  
21 2. Monica L. Montgomery is currently the attorney of record for Rampart, and respectfully  
22 requests that this Court issue an order permitting the withdrawal from representation of  
23 Rampart.  
24 3. The parties involved, Rampart and Law Offices of Monica L. Montgomery, have agreed  
25 to terminate their relationship as attorney and client herein.  
26 4. Rampart does not oppose this motion, and has agreed to seek counsel so as not to delay  
27 these proceedings.  
28 5. The following is a list of all pending settings and deadlines in this case:

Continued 340) at meeting scheduled on August 21, 2012.

Therefore, Monica Montgomery prays that the court enter an order authorizing her to withdraw from representation as attorney for Baumgart.

8/15/12

2/15/12



Monica Montgomery  
Attorney at Law

From Article at GetOutOfDebt.org

**PROOF OF SERVICE**

I, Monica Montgomery, declare as follows:

I am employed in the County of San Diego, State of California; I am over the age of eighteen years and am not a party to this action; my business address is The Law Offices of Monica L. Montgomery 2667 Camino del Rio South, Suite 301-12, San Diego, CA 92108, in said County and State. On August 16, 2012, I served the following document(s):

**APPLICATION BY LAW OFFICES OF MONICA L. MONTGOMERY FOR LEAVE TO WITHDRAW FROM REPRESENTATION OF DEBTOR IN POSSESSION RAMPART MMW, INC.**

on each of the interested parties stated on the attached service list.

**I. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING ("NEF"):**

Pursuant to controlling General Order(s) and Local Bankruptcy Rules ("LBR"), the foregoing document will be served by the court via NEF and hyperlink to this document. On August 16, 2012, I checked the CM-ECF docket for this bankruptcy case or adversary proceeding and determined that the following person(s) are on the Electronic Mail Notice list to receive NEF transmission at the email address(es) indicated below:

- Office of the United States Trustee** – [ustp.region15sop@usdoj.gov](mailto:ustp.region15sop@usdoj.gov)
- Mary M. Testerman-DuVoisin - [mary.m.testerman@usdoj.gov](mailto:mary.m.testerman@usdoj.gov)
- Tiffany Carroll, US Trustee - [tiffany.carroll@usdoj.gov](mailto:tiffany.carroll@usdoj.gov)
- [tgaran@piteduncan.com](mailto:tgaran@piteduncan.com)
- [Margaret@parkinsonphinney.com](mailto:Margaret@parkinsonphinney.com)

**II. TO BE SERVED VIA FIRST CLASS MAIL:**

The foregoing document will be served on all parties in this action by placing a true and correct copy in a sealed envelope, with postage thereon fully prepaid, in the United States Post Office mailbox to Ft. Worth, Texas and San Diego, CA as set forth at the address(es) indicated below:

Lawrence Day  
9112 Camp Bowie W  
Suite 405  
Ft. Worth, TX 76116

Richard Moran  
4366 Conner Court  
San Diego, CA 92117

**Dated: August 16, 2012**

/s/ Monica Montgomery  
**MONICA MONTGOMERY**