

IN THE SUPERIOR COURT OF FLOYD COUNTY
STATE OF GEORGIA

MARK COCHRAN,	)	
	)	
Plaintiff,	)	CIVIL ACTION FILE
	)	NO. 23-CV-862
vs.	)	
	)	
CITY OF ROME, GEORGIA, et al.	)	
	)	
Defendants.	)	

**MOTION OF CHRISTOPHER BALCH AND THE BALCH LAW GROUP TO
WITHDRAW AS COUNSEL FOR DEFENDANTS**

COMES NOW Christopher D. Balch and the Balch Law Group, counsel for Defendants who have not yet answered or responded to Plaintiff's complaint, and moves this Court for an order to allow them to withdraw as Counsel of Record for all Defendants pursuant to the terms and conditions of Rule 4.3 of the Georgia Uniform Superior Court Rules.

1.

The undersigned has given his clients due written notice of this intention to withdraw prior to submitting this request to the Court as shown by the attached notification certificate.

2.

In accordance with the notice to withdraw, the undersigned further certifies Defendants City of Rome, Sharon Sewell, Harry Harvey, and Ken Carson are further informed under Rule 4.3 that

- a. The Superior Court of Floyd County currently retains jurisdiction of this matter:
- b. Defendants have the burden of keeping the Court informed of their current address for service of notices, pleadings, or other papers;

- c. Defendants have the obligation to prepare to go forward with their case or to hire other counsel to handle their case;
- d. If Defendants fail or refuse to meet these obligations, they may suffer adverse consequences including entry of judgment against them;
- e. Defendants must file any objections to this Motion to Withdraw with this Court no later than 10 days from the date of the filing of this motion.

WHEREFORE, the Undersigned Christopher D. Balch and the Balch Law Group respectfully request that an Order be entered permitting them to withdraw as attorney of record for Defendants.

This 27th day of July, 2023.

BALCH LAW GROUP

/s/ Christopher D. Balch
CHRISTOPHER D. BALCH
Georgia State Bar No. 034015

830 Glenwood Ave., SE
Suite 510-220
Atlanta, GA 30316
404/202-5934
chris@balchlawgroup.com

**COUNSEL'S CERTIFICATE OF NOTICE TO DEFENDANTS OF
INTENT TO WITHDRAW**

I, CHRISTOPHER D. BALCH, counsel of record for Defendants in the above-styled action, hereby certify that on July 22, I served notice on defendants in this action of my intent to seek an Order of this Court to permit the withdrawal of me and my law firm as Counsel of Record in this matter. In that notice, Defendants were provided Notice of their Right to Object and of their obligations if Counsel is permitted to withdraw.

This 27th day of July, 2023.

BALCH LAW GROUP

/s/ Christopher D. Balch

CHRISTOPHER D. BALCH

Georgia State Bar No. 034015

830 Glenwood Ave., SE
Suite 510-220
Atlanta, GA 30316
404/202-5934
chris@balchlawgroup.com

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the within and foregoing document was served on opposing counsel via electronic service and utilizing the Court's Electronic Case Filing and Case Management System, to wit:

Jeremy T. Berry
[Jberry@cglawfirm.com](mailto:jberry@cglawfirm.com)
Joseph J. Siegelman
[Jsiegelman@cglawfirm.com](mailto:jsiegelman@cglawfirm.com)

This 27th day of July, 2023.

BALCH LAW GROUP

/s/ Christopher D. Balch
CHRISTOPHER D. BALCH
Georgia State Bar No. 034015

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PROPOSED ORDER AUTHORIZING WITHDRAWAL OF COUNSEL

The Court having reviewed and considered the Motion of Counsel to withdraw and there having been no objection to the Motion, Counsel's Motion is GRANTED and Christopher Balch and the Balch Law Group are removed as Counsel of Record for Defendants.

This ____ day of July/August, 2023

John E. Niedrach, Judge
Superior Court of Floyd County

Order prepared by:

/s/ Christopher D. Balch
CHRISTOPHER D. BALCH
Georgia State Bar No. 034015