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COUNSEL FOR WASTE MANAGEMENT NATIONAL, INC.

IN THE UNITED STATES BANKRUPTCY COURT FOR THE NORTHERN DISTRICT OF TEXAS DALLAS DIVISION

In re:	_)	Chapter 11
FRESH ACQUISITIONS, LLC, et. al., 1)	Case No. 21-30721 (SGI)
Debtors.)	Jointly Administered

MOTION TO WITHDRAW AS COUNSEL OF RECORD AND REQUEST FOR WITHDRAWAL FROM THE COURT'S CM/ECF NOTICES OF FILING FOR THIS ACTION

Emma L. Persson ("Movant"), moves, pursuant to L.B.R. 2091-1, to withdraw as counsel for Waste Management National, Inc., a creditor and party-in-interest in the above-captioned bankruptcy case ("Waste Management"), and to withdraw from receiving Notices of Electronic Filing from the Court's CM/ECF filing system for this action and in support thereof state as follows:

- 1. Movant is an attorney of record for Waste Management in this action.
- 2. As of July 28, 2021, Movant is no longer employed with the law firm of Norton Rose Fulbright US LLP and thus seeks to withdraw as counsel of record for Waste Management.

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¹ The Debtors in these chapter 11 cases and the last four digits of each Debtor's taxpayer identification number are as follows: Alamo Fresh Payroll, LLC (1590); Fresh Acquisitions, LLC (2795); Alamo Ovation, LLC (9002); Buffets LLC (2294); Hometown Buffet, Inc. (3002); Tahoe Joe's Inc. (7129); OCB Restaurant Company, LLC (7607); OCB Purchasing, Co. (7610); Ryan's Restaurant Group, LLC (7895); Fire Mountain Restaurants, LLC (8003); Food Management Partners, Inc. (7374); FMP SA Management Group, LLC (3031); FMP-Fresh Payroll, LLC (8962); FMP-Ovation Payroll, LLC (1728); and Alamo Buffets Payroll, LLC (4 W., Suite 350, San Antonio TX, 78248, United States.

- 3. Waste Management will continue to be represented by Ryan E. Manns of Norton Rose Fulbright US LLP, located at 2200 Ross Avenue, Suite 3600 Dallas, Texas 75201-7932.
- 4. Movant has found good cause to withdraw as counsel for Waste Management, given that Movant is no longer with Norton Rose Fulbright US LLP, the firm representing Waste Management and Waste Management's representation otherwise remains unchanged.
- 5. Waste Management has been notified of this Motion and has been informed that, upon its granting, Movant will no longer represent Waste Management.
- 6. No party will be prejudiced by the requested withdrawal given the current status of the case.
- 7. Movant respectfully requests that she be withdrawn from receiving the Notices of Electronic Filing from the Court's CM/ECF filing system for this action.
- 8. A Proposed Order granting Movant's Motion to Withdraw as Counsel of Record and withdrawal from receiving Notices of Electronic Filing from the Court's CM/ECF filing system for this action is attached hereto as **Exhibit A**.

WHEREFORE, Emma L. Persson, respectfully request that this Court enter an order permitting her withdrawal as counsel of record and withdrawal as recipient of the Notices of Electronic Filing from the Court's CM/ECF filing system for this action.

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Dated: July 27, 2021 Respectfully submitted,

/s/ Emma L. Persson

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Counsel to Waste Management National Inc.

CERTIFICATE OF SERVICE

The undersigned attorney hereby certifies that a true and correct copy of the foregoing document upon the counsel and parties of record, electronically through the Bankruptcy Court's Electronic Case Filing System on those parties that have consented to such service, on the 27th day of July 2021.

/s/ Emma L. Persson _____ Emma L. Persson

CERTIFICATE OF CONFERENCE

Pursuant to L.B.R. 7007-1(b), counsel for Waste Management has conferred with counsel for the Debtor, who have not advised that they oppose this motion.

<u>/s/ Ryan E. Manns</u> Ryan E. Manns