

**UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
WESTERN DIVISION**

**FILED**  
2003 MAY 15 PM 3:06  
U.S. BANKRUPTCY COURT  
NORTHERN DIST. OF ILLINOIS

In re:

DAWN K. EIEMAN,

Bankruptcy Case No. 01-70717

Adversary Case No. 02-07328

Debtor(s)\*

**NOTICE TO CREDITORS AND OTHER PARTIES IN INTEREST**

*Notice is hereby given that:* a hearing in said cause will be held at Room 115 Federal Building, 211 S. Court Street, Rockford, Illinois, 61101, on the 28th day of May, 2003 at 9:30 o'clock A.M. to consider and act upon the following matters:

**MOTION TO WITHDRAW**

and transact such other business as may properly come before the meeting.

By:  \_\_\_\_\_

Date of Issuance: 5/14/03

\*Include all names used by Debtor(s) within last 6 years.

**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 RELIEF SOUGHT, OR IF YOU WANT THE COURT TO CONSIDER YOUR VIEWS ON THE MOTION, THEN YOU OR YOUR ATTORNEY MUST ATTEND THE HEARING, OR YOU OR YOUR ATTORNEY MUST FILE A WRITTEN RESPONSE TO THE ABOVE MOTION ON OR BEFORE THE DATE SET FOR HEARING ON THE MOTION AT THE U.S. BANKRUPTCY COURT, 211 S. COURT 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.

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MAR 15 2003



UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF ILLINOIS  
WESTERN DIVISION

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2003 MAY 15 PM 3:06  
U.S. Bankruptcy Court  
NORTHERN DIST. OF ILLINOIS

IN RE: )  
)  
DAWN K. EIERSMAN, ) Bankruptcy No. 01-70717  
)  
Debtor. ) Adversary No. 02-07328  
MEGAN G. HEEG, )  
)  
Plaintiff, )  
)  
v. )  
)  
SINGER ASSET FINANCE COMPANY, )  
LLC, )  
Defendant. )

**MOTION TO WITHDRAW**

NOW COMES Defendant, Singer Asset Finance Company, LLC ("Singer"), by its attorneys, McGreevy, Johnson & Williams, P.C., in support of its Motion to Withdraw, states as follows:

1. Debtor filed for relief under Chapter 7 of the United States Bankruptcy Code on or about March 2, 2001.
2. The first meeting of creditors was held on March 30, 2001.
3. The current acting trustee is Megan G. Heeg.
4. The current adversary was filed on December 31, 2002.
5. Daniel M. Donahue and McGreevy, Johnson & Williams, P.C. have been representing Singer Asset Finance Company, LLC, one of the defendants in the current adversary.


6. There has arisen a difference of opinion between counsel for Singer Asset Finance Company, LLC and Daniel M. Donahue and McGreevy, Johnson & Williams, P.C. wish to withdraw as counsel.

7. Daniel M. Donahue and McGreevy, Johnson & Williams, P.C. ask this Court to set a date by which Singer Asset Finance Company, LLC, shall appear with substitute counsel and to approve the withdrawal of counsel.

WHEREFORE, Singer Asset Finance Company, LLC, asks that this Court enter an Order approving the withdrawal of Daniel M. Donahue and McGreevy, Johnson & Williams, P.C. as counsel for Singer Asset Finance Company, LLC, setting a date by which Singer Asset Finance Company, LLC shall have substitute counsel prepared to enter its appearance, and granting such other relief as the Court deems necessary and proper.

SINGER ASSET FINANCE COMPANY, LLC

BY: MCGREEVY, JOHNSON & WILLIAMS, P.C.

By:   
\_\_\_\_\_

Daniel M. Donahue

Daniel M. Donahue  
McGreevy, Johnson & Williams, P.C.  
6735 Vistagreen Way  
P.O. Box 2903  
Rockford, IL 61132-2903  
815/639-3700  
815/639-9400 (fax)

STATE OF ILLINOIS            )  
  ) SS.  
COUNTY OF WINNEBAGO        )

**AFFIDAVIT OF SERVICE**

I, the undersigned, being first duly sworn on oath, depose and state that I served the  
**Motion to Withdraw** attached hereto upon the within named:

Megan G. Heeg, Esq.  
P.O. Box 447  
Dixon, IL 61021

Stephen G. Balsley, Esq.  
One Madison St.  
Rockford, IL 61104

Dawn K. Eierman  
P.O. Box 141  
Lindenwood, IL 61049

Adam Zoldessy  
Adam Zoldessy, P.C.  
201 Broadway  
Bayonne, NJ 07002

Kenneth R. Barnett  
Vice President & Managing  
Attorney  
Singer Asset Finance Company,  
L.L.C.  
2700 N. Military Trail, Suite 300  
Boca Raton, FL 33431

Brian P. Mack, Esq.  
Richardson, Stasko, Boyd & Mack, LLC  
19 S. LaSalle St., Ste. 1500  
Chicago, IL 60603

by sealing a true and correct copy of same in an envelope, addressed as shown above, with  
sufficient United States postage and by depositing said envelope, so sealed and stamped, in the  
United States Mail at Rockford, Illinois, at or about the hour of 5:00 p.m., on the 14 day of  
May, 2003.

*Annette Roman*

Subscribed and sworn to before me this 14 day of May, 2003.

*Nancy J. Watters*  
NOTARY PUBLIC  
"OFFICIAL SEAL"  
NANCY J. WATTERS  
Notary Public State of Illinois  
My Commission Expires 04-16-2006