UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF KENTUCKY LEXINGTON DIVISION

HANNA ALBINA and AUSTIN WILLARD, individually and on behalf of others similarly situated, Plaintiffs,)) CIVIL ACTION NO. 5:20-cv-00496-) JMH
VS.)
THE ALIERA COMPANIES, INC., TRINITY HEALTHSHARE, INC., and ONESHARE)
HEALTH, LLC d/b/a UNITY HEALTHSHARE,)
LLC, Defendants.)
Detendunts.) _)

MOTION TO WITHDRAW AS COUNSEL FOR DEFENDANT TRINITY HEALTHSHARE, INC.

Pursuant to Local Rule 83.6, Jon A. Woodall and the law firm of McBrayer PLLC (collectively "Movants"), hereby respectfully move this Honorable Court to enter an Order allowing Movants' withdrawal as counsel of record for Defendant Trinity Healthshare, Inc. ("Trinity"), stating as follows:

- 1. Per DE 54, all claims against Trinity are stayed due to Trinity's filing for bankruptcy. Movants have no active role in the bankruptcy matter and continued representation of Trinity would be unreasonably difficult and unnecessary.
- 2. Movants request that Trinity be granted at least thirty (30) days in which to obtain new counsel, if they so desire.
 - 3. Movants certify it has advised Trinity of its intentions to withdraw in this matter.

WHEREFORE, Movants respectfully request that this Court enter an Order allowing Movants to withdraw from representation of Trinity in this matter.

Dated: December 1, 2021

Respectfully Submitted,

/s/ Jon A. Woodall

Jon A. Woodall
Luke Morgan
Scott A. Schuette
MCBRAYER PLLC
201 E. Main Street, Suite 900
Lexington, KY 40507
Telephone: (859) 231-8780
jwoodall@mcbrayerfirm.com
lmorgan@mcbrayerfirm.com
sschuette@mcbrayerfirm.com
Attorneys for Defendant
TRINITY HEALTHSHARE, INC.

CERTIFICATE OF SERVICE

I hereby certify that on December 1, 2021, I filed the foregoing document via the Court's ECF system, which will cause a true and correct copy of the same to be served electronically on all ECF-registered counsel of record.

/s/ Jon A. Woodall
Jon A. Woodall

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF KENTUCKY LEXINGTON DIVISION

HANNA ALBINA and AUSTIN WILLARD, individually and on behalf of others similarly situated, Plaintiffs,))) CIVIL ACTION NO. 5:20-cv-00496-) JMH
VS.)
THE ALIERA COMPANIES, INC., TRINITY HEALTHSHARE, INC., and ONESHARE HEALTH, LLC d/b/a UNITY HEALTHSHARE, LLC, Defendants.)))))))))))

THE COURT, having considered counsel for Defendant Trinity Healthshare, Inc.'s ("Trinity") Motion to Withdraw and the facts and arguments contained therein, finds that the Motion is well-taken and should be granted.

ACCORDINGLY, the Court hereby GRANTS McBrayer PLLC's Motion to Withdraw and FINDS AND ORDERS that Jon A. Woodall, Luke Morgan and Scott A. Schuette and the law firm of McBrayer PLLC are discharged and terminated as counsel of record for Trinity in this matter.

THE COURT further finds that Trinity shall have thirty (30) days from the date of this Order in which to hire replacement counsel, and that all upcoming deadlines in the next thirty (30) days from the date of this Order are extended for sixty (60) days from the date(s) of such deadlines.

Dated:	December	2021.
		/s/
		UNITED STATES DISTRICT COURT JUDGE