

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

SECURITIES AND EXCHANGE
COMMISSION,

Plaintiff,
v.

PATRICK O. HOWARD;
HOWARD CAPITAL HOLDINGS, LLC;
AND OPTIMAL ECONOMICS CAPITAL
PARTNERS, LLC,

Defendants.

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Civil Action No. 3:17-CV-420- L

AGREED EMERGENCY MOTION FOR WITHDRAWAL OF COUNSEL

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW James S. Bell, Esq. and James S. Bell, P.C. (hereinafter collectively referred to as the “Movants”), counsel for Dovile Soblinkas, (hereinafter collectively referred to as “Soblinkas”) and files this, their Agreed Emergency Motion to Withdraw as Counsel of Record (the “Motion”), and respectfully shows this Honorable Court the following:

SUMMARY AND SUBSTANCE OF THE MOTION

1. The Movants respectfully request that this Honorable Court allow them to withdraw as counsel for Soblinkas. Soblinkas has agreed to the Motion. Soblinkas wishes to immediately terminate the attorney-client relationship.

2. It is well established Texas law that law firms may withdraw as counsel for a client. There is no prejudice to Soblinkas as she has represented to the undersigned that she has obtained or is in the process of immediately hiring new counsel. The succeeding attorney is unknown at this time. Soblinkas wishes that the attorney-client relationship be terminated.

3. It is in the Movants' best interests as well as the best interests of Soblinskas that this Honorable Court grant this Motion and that the attorney-client relationship be immediately terminated.

4. Soblinskas has been advised as to all deadlines and all procedural aspects with respect to the above-captioned case. Soblinskas has also been advised of the Movants' desire to withdraw as her counsel of record.

5. Soblinskas last known address is 4610 Weldon, Dallas, Texas 75204, Phone number (708) 307-9351, Email dovile.soblinskas@gmail.com.

6. A copy of this motion has been delivered to Soblinskas, who has been notified writing of her right to object to this motion.

7. **Soblinskas has consented to the motion.**

8. Soblinskas is aware of **the deadline of May 25, 2017 to respond to the Motion to Show Cause.**

9. Accordingly, in light of the aforementioned, the Movants respectfully request that this Honorable Court allow the Movants to withdraw as counsels for Soblinskas. This Motion is not sought for delay, but so that justice is served.

PRAYER

WHEREFORE, PREMISES CONSIDERED, the Movants respectfully move this Honorable Court for an Order permitting and granting the withdrawal of the Movants as counsels of record for Soblinskas, and providing that the Movants are relieved of any further responsibility associated with the representation of Soblinskas. The Movants respectfully request such further general or specific relief to which they may be entitled.

DATED: May 21, 2017

AGREED:

Dovile Soblinskas
Dovile Soblinskas

Respectfully submitted,

/s/ James S. Bell
James S. Bell
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Dallas, Texas 75204
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing Notice has been served in accordance with the Federal Rules of Civil Procedure.

/s/ James S. Bell
James S. Bell