

DEC - 1 2016

## IN THE DISTRICT COURT OF CANADIAN COUNTY

STATE OF OKLAHOMA

JUDGE GARY E. MILLER ON

THE 20 DAY OF Jour

XEROX CORPORATION. Plaintiff, VS. Case No. CJ-2016-263 TATE PUBLISHING & ENTERPRISES LLC SET FOR HEARING BEFORE

and RYAN TATE.

Defendants.

## <u>APPLICATION</u> TO WITHDRAW

COMES NOW Ramey & Tharp by George H. Ramey, attorney of record for Tate Publishing & Enterprises LLC and Ryan Tate herein, and hereby requests this Court to enter its Order allowing the Law Firm to withdraw as attorney of record for the Defendants as set out above, for the reason that said clients entered into an employment contract dated July 14th, 2016, and pursuant thereto they have not fully cooperated in preparation of the case or communicated with The Firm to supply necessary information and make their representatives available, and answer calls.

For the further reason that said clients have failed to meet their financial obligations with the Law Firm. In support of its Application Ramey and Tharp would show the Court as follows:

1. Defendants last known mailing address is

> 127 East Trade Center Mustang, OK 73064

WHEREFORE, Ramey & Tharp, prays that this Court enter its Order allowing Ramey & Tharp to withdraw as attorney of record for Defendants.

Respectfully submitted,

**RAMEY & THARP** 

GEORGE H. RAMEY, OBA #7401

Ramey & Tharp

Three South Fifth Street

Yukon, OK 73099

(405) 354-1987

(405) 354-1992 - Facsimile

## **CERTIFICATE OF MAILING**

This is to certify that a true and correct copy of the above and foregoing Application to Withdraw was mailed this \_\_\_\_\_\_\_, 2016, with sufficient postage prepaid thereon to:

Tate Publishing Enterprises LLC 127 East Trade Center Mustang, OK 73064

Mr. Ryan Tate 127 East Trade Center Mustang, OK 73064 James Vogt Reynolds, Ridings, Vogt, & McCart, PLLC 101 Park Avenue, Suite 1010 Oklahoma City, OK 73102

Attorney for Plaintiff

George H. Ramey