

**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,)	CIVIL ACTION NO. 5:20-cv-00496-
Plaintiffs,)	JMH
)	
vs.)	
)	
THE ALIERA COMPANIES, INC., TRINITY)	
HEALTHSHARE, INC., and ONESHARE)	
HEALTH, LLC d/b/a UNITY HEALTHSHARE,)	
LLC,)	
Defendants.)	
)	
)	

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

Pursuant to Local Rule 83.6, Jon A. Woodall and the law firm of McBryer 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@mcbayerfirm.com

lmorgan@mcbayerfirm.com

sschuette@mcbayerfirm.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

