

**KENNETH VERCAMMEN
& ASSOCIATES, PC**
2053 Woodbridge Ave.
Edison, NJ 08817
732-572-0500

Withdrawing Attorney for c1

p1

Plaintiff

vs

d1,
Defendant

SUPERIOR COURT OF NEW
JERSEY LAW DIVISION,
MIDDLESEX COUNTY

DOCKET NO.

Civil Action
NOTICE OF MOTION FOR
KENNETH VERCAMMEN TO BE
RELIEVED AS COUNSEL

TO: _____, ESQ.

c1

Please Take notice that the undersigned, **Withdrawing** attorney for c1, will apply to the above named court, at the Court House, New Brunswick, New Jersey, on Friday, _____, 2008 at 9 o'clock a.m. or as soon thereafter as counsel may be heard for an Order:

1. For Kenneth Vercammen, Esq. to be relieved as Counsel for c1

Please take further notice that the undersigned shall rely upon the certification of Kenneth A. Vercammen in support of this motion.

PLEASE TAKE FURTHER NOTICE that this motion is filed with the court pursuant to Rule 1:6-2 and that unless an objection by any of the parties hereto is received at least eight (8) days prior to the return date indicated herein, or unless otherwise directed by the court, the movant shall submit the within application for decision by the court upon the papers and without the necessity of oral argument.

No Arbitration, settlement conference or Trial date is scheduled in this matter. The discovery end date is ____

Dated: _____

KENNETH A. VERCAMMEN, ESQ.
Withdrawing Attorney for c1

CERTIFICATION OF MAILING

The undersigned hereby certifies that the original Notice of Motion, Certification and all supporting papers have been filed directly with the Middlesex County Motions Clerk, New Brunswick, New Jersey.

It is further certified that a copy of the Notice of Motion, Certification and all supporting papers have been served by regular mail upon all counsel and individuals indicated in the Notice of Motion, including

c1

Dated: _____

KENNETH A. VERCAMMEN Esq.
Withdrawing Attorney for c1

**KENNETH VERCAMMEN
& ASSOCIATES, PC**

2053 Woodbridge Ave.
Edison, NJ 08817
732-572-0500

Withdrawing Attorney for c1

p1			SUPERIOR COURT OF NEW JERSEY LAW DIVISION, MIDDLESEX COUNTY
	vs	Plaintiff	
d1,		Defendant	DOCKET NO.
			Civil Action
			Certification in Support of Motion to Be Relieved

I, KENNETH A. VERCAMMEN, of full age, do hereby certify the following:

1. I am an attorney at law of the State of New Jersey. I represented c1 and am fully aware of the facts and circumstances of this Motion.
2. c1 retained the Law Office of KENNETH VERCAMMEN AND ASSOCIATES, to provide legal services. A written retainer agreement was provided. The retainer agreement required the client to cooperate fully with the law office.
3. c1 has failed to cooperate with our office. c1 has ignored our recent letter to them. c1 will not assist us in preparing this case for court.
4. We informed c1 by letter that they should retain a new attorney.
5. In addition, Despite performing numerous tasks and providing legal services at the request of c1, he has failed to pay in full the bill for legal services.
6. c1 has not paid any of the past due bill.
7. We are unable to properly represent an individual who will not pay for legal services rendered or fully cooperate.
8. It is respectfully that the Law Office of KENNETH A. VERCAMMEN AND ASSOCIATES, PC be relieved as counsel for c1.

I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Dated:

**KENNETH VERCAMMEN
& ASSOCIATES, PC**

2053 Woodbridge Ave.
Edison, NJ 08817
732-572-0500

Withdrawing Attorney of c1

p1	Plaintiff	SUPERIOR COURT OF NEW JERSEY LAW DIVISION, MIDDLESEX COUNTY
	vs	DOCKET NO.
d1,	Defendant	Civil Action ORDER For Kenneth Vercammen to be Relieved as Counsel

This matter having been opened to the Court upon motion of Kenneth A. Vercammen, Esq., attorney for c1 for an Order

1. for Kenneth Vercammen & Associates, Esq. to be relieved as Counsel for c1 and the Court having considered the Certification submitted, documents attached in support of the Motion, and the argument of counsel, if any, and for good cause shown, it is on this ____ day of _____

ORDERED that Kenneth Vercammen, Esq. is relieved as Counsel for c1, and it is

FURTHER ORDERED that a copy of this order be served upon all Counsel and also upon c1 within ten (10) days, it is

FURTHER ORDERED that all future notices be sent to the defendants at

_____:

and it is FURTHER ORDERED the defendants shall obtain other counsel or appear pro se.

J.S.C.

___ Opposed
___ Unopposed