IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF VIRGINIA ALEXANDRIA DIVISION

)
GLOBAL HUB LOGISTICS, et al.,	,)
Plaintiffs/Counter-Defendants,)
v.) Civ. A. No. 1:12-cv-1350-GBL-IDD
TAMERLANE GLOBAL SERVICES, INC.,)
Defendant/Counter-Plaintiff.)
	_)

MEMORANDUM IN SUPPORT OF UNOPPOSED MOTION TO WITHDRAW

to Local Rules 7 and 83.1(G) and Federal Rule of Civil Procedure 7, for leave to withdraw as counsel to Defendants/Counter-Plaintiffs Tamerlane Global Services, Inc. ("Tamerlane") and James O'Brien ("O'Brien") in this matter. In accordance with Virginia Rule of Professional Conduct 1.16(b), Troutman Sanders LLP submits that the continued representation of Tamerlane has been rendered unreasonably die and O'Brien have substantial outstanding bills to Troutman Sanders LLPno payment toward the outstanding bills has been made in several months, and the lines of communications between Troutman Sanders LLP and Tamerlan O'Brinformation or documents, Troutman Sanders LLP can make the information available for the Court's in camerareview.

Troutman Sanders LLP hereby files this Memorandum in Support of its motion, pursuant

the breakdown of the relationship, the engagement has become a considerable and unfair burden upon Troutman Sanders LLP. Undersigned counsel has consulted with counsel for Plaintiffs/Counter-Defendants Global Hub Logistics, and Global Hub Logistics does not oppose this motion. Accordingly, pursuant to Virginia Rule of Professional Conduct 1.16(b) and Local Rule 83.1, the Court should permit Troutman Sanders LLP to withdraw as Tamerlane's and O'Brien's counsel in this matter.

Troutman Sanders LLP was retained by Tamerlane and O'Brien to serve as litigation counsel in this case, Civ. A. No. 1:12-cv-1350-GBL-ID

Troutman Sanders LLP fully represented Tamerlane and O'Brien throughout the pretrial motions, discovery, and trial phases of this case. As the Court well knows, the matter proceeded to trial on October 15, 2013 and continued for six days of testimony and several additional days of deliberation by the jury. The trial phase was completed when the jury returned its verdict on October 28, 2013, judgment was entered on that same day, and this Court ruled on and denied Tamerlane's post-trial motions on March 26, 2014. At no point was the scope of Troutman Sanders LLP's representation extended to appellate or other post-judgment representation.

In determining whether to grant a motion to withdraw as counsel, courts in this district apply the Virginia Rules of Professional Condu**8**tee Portsmouth Redevelopment and Housing Authority v. BMI 7Tj 0.07 (MI) T8 Tc () Tj 0 Tc (Por)0 Tc (oMI) Tj 2.76 Tc () Tc (oMI) Tj 2.76 Tc () T

(4)

Supp. 2d 730, 732-33 (W. D. Va. 2009) (permitting

CERTIFICATE OF SERVICE

I hereby certify that on April 4, 2014, I filed a copy of the foregoing Memorandum in Support of Unopposed Motion to Withdraw with the Court via the CM/ECF system, which will notify the following counsel of record:

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