

**SOAH DOCKET NO. 582-23-21878
TCEQ DOCKET NO. 2023-0385-MWD**

APPLICATION OF HK REAL ESTATE DEVELOPMENT, LLC FOR NEW TEXAS POLLUTION DISCHARGE ELIMINATION SYSTEM PERMIT NO. WQ0016150001	§ § § § §	BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS
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MOTION TO WITHDRAW AS COUNSEL

Branscomb Law and Clint Buck (“Movant”), attorney for Freasier, LLC (“Protestant”) request permission to withdraw from representing Protestant in this matter.

1. Good cause exists for withdrawal of the Movant because the attorney-client relationship has broken down and Movant can no longer effectively represent Protestant.

2. Protestant’s last known address, telephone number, and email address are as follows:

Attn: James Freasier, Jr.
6880 US Highway 181 North,
Floresville, Texas 78114
(830) 393-0083
jlf@fandwelectrical.com

3. Protestant has been notified of all pending settings and deadlines. This matter is scheduled to be considered by the Texas Commission on Environmental Quality on Friday, May 10, 2024 at 9:30 A.M. in Room 244 of the Texas Workforce Commission located at 101 East 15th Street in Austin, Texas, virtually, or both in person and virtually.

4. Protestant has not stated whether it consents to the withdrawal. Protestant has been served with a copy of the motion through its general counsel, John McClung, and informed of the right to object to the withdrawal.

5. This Motion is not sought for the purpose of delay only.

THEREFORE, Movant Clint Buck and the law firm of Branscomb Law ask this Court to grant this Motion to Withdraw and award all other relief to which they may deem themselves justly entitled.

Dated: April 29, 2024

Respectfully submitted,

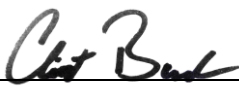
BRANSCOMB LAW
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By:  _____

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Attorneys for Freasier, LLC

CERTIFICATE OF CONFERENCE

I hereby certify that I conferred with Counsel for Applicant, Helen S. Gilbert, BARTON BENSON JONES, PLLC, on March 28 and 29 about this motion. Applicant's Counsel is not opposed.

 _____
Clint Buck

CERTIFICATE OF SERVICE

The undersigned certifies that a true copy of the foregoing was served on April 29, 2024, to the following:

Helen S. Gilbert
State Bar No. 00786263
Randall B. Wilburn
State Bar No. 24033342
BARTON BENSON JONES, PLLC
7000 N. MoPac Expwy, Suite 200
Austin, Texas 78731

Via: E-file and/or E-mail
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 Hand delivery

- and -

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 Hand delivery

Mr. Michael Parr, Staff Attorney
Mr. Fernando Martinez, Staff Attorney
Office of Legal Services
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Austin, TX 78711-3087

Via: E-file and/or E-mail
 Fax
 Mail
 Hand delivery

Freasier, LLC
By and through its attorney, John L. McClung
3310 Oakwell Court, #15101
San Antonio, Texas 78218

Via: E-file and/or E-mail
 Fax
 Mail
 Hand delivery



Clint Buck