

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND  
NORTHERN DIVISION

GLOBAL NATURAL, LLC

\*

Plaintiff,

\*

v.

\*

Case No. 1:17-CV-01799-GLR

HAKAN AGRO DMCC, *et al.*

\*

Defendants.

\*

\* \* \* \* \*

**MOTION FOR LEAVE TO WITHDRAW AS COUNSEL**

Pursuant to Local Rule 101.2.b, Plaintiff and Counterclaim Defendant Global Natural, LLC (“GN”), by and through its undersigned counsel, respectfully requests that this Court grant William M. Krulak, Jr. and Zachary S. Schultz leave to withdraw their appearances as attorneys of record in this matter. In support of this motion, Global Natural states as follows:

1. Attorneys Krulak and Schultz appeared on behalf of Global Natural on June 29, 2017 by filing the original Complaint in this matter.

2. On January 3, 2018, counsel informed GN, through its managing member, Mike Spangler, that their firm was terminating its engagement by GN with respect to all matters (the “Termination Letter”).

3. The Termination Letter, which was emailed to Mr. Spangler and acknowledged by him from his email address (mike.spangler0578@gmail.com), further advised GN that counsel would be filing this Motion and advised GN to engage new counsel. GN was advised that if no new counsel were engaged to enter an appearance, the Court may dismiss GN’s claims and/or enter a default judgment on any claims against it.

4. GN's last known address was Suite B, 303 Second Street, Annapolis, Maryland 21403, and this is the address that is still on file with the State Department of Assessment and Taxation. Since filing the original complaint in this matter, GN has ceased operations and no longer occupies this location in Annapolis and has no other physical address.

**WHEREFORE**, Plaintiff Global Natural, LLC, respectfully requests that the Court grant William M. Krulak, Jr. and Zachary S. Schultz leave to withdraw as attorneys of record in this action.

Dated: January 16, 2018

Respectfully Submitted,

/s/ William M. Krulak, Jr.  
William M. Krulak, Jr.  
Zachary S. Schultz  
Miles & Stockbridge  
100 Light Street  
Baltimore, Maryland 21202  
Tel: (410) 385-3448  
Fax: (410) 698-4501

*Counsel for Plaintiff  
Global Natural, LLC*

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND  
NORTHERN DIVISION

GLOBAL NATURAL, LLC

\*

Plaintiff,

\*

v.

\*

Case No. 1:17-CV-01799-GLR

HAKAN AGRO DMCC, *et al.*

\*

Defendants.

\*

\* \* \* \* \*

**ORDER**

Having reviewed the Motion for Leave to Withdraw as Counsel for Plaintiff and Counterclaim Defendant Global Natural LLC and receiving no objections, it is this \_\_\_\_ day of \_\_\_\_\_, 2018:

ORDERED that the Motion for Leave to Withdraw as Counsel for Plaintiff and Counterclaim Defendant Global Natural LLC is hereby GRANTED of William M. Krulak, Jr. and Zachary S. Schultz and Miles & Stockbridge, P.C. are relieved of any and all further duties in this matter.

\_\_\_\_\_  
Judge, United States District Court  
for the District of Maryland