

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

U.S. EQUAL EMPLOYMENT  
OPPORTUNITY COMMISSION,

Civil Action: 2:16-cv-00225-CB

Plaintiff,

v.

SCOTT MEDICAL HEALTH CENTER, P.C.

JUDGE CATHY BISSOON

Defendant.

**MOTION FOR LEAVE TO WITHDRAW AS COUNSEL FOR  
DEFENDANT SCOTT MEDICAL HEALTH CENTER, P.C.**

AND NOW, come MARGOLIS EDELSTEIN, CHARLES H. SAUL, ESQUIRE, and KYLE T. MCGEE, ESQUIRE to file the within Motion for Leave to Withdraw as Counsel for Defendant Scott Medical Health Center, P.C. ("Scott Medical") as follows:

1. Margolis Edelstein, Charles H. Saul, Esquire, and Kyle T. McGee were retained by Scott Medical for legal representation in the above captioned action.
2. The attorney-client relationship has been irretrievably broken.
3. The undersigned's current billing invoices to Scott Medical have remained unpaid.
4. On June 7, 2017, Scott Medical filed a Voluntary Petition for Relief Under Chapter 11 of the United States Code, which petition is pending in the United States Bankruptcy Court for the Western District of Pennsylvania under Case Number 17-22357.
5. The undersigned are unable to continue representing Scott Medical without timely payment for legal services rendered.
6. Scott Medical has been advised that there are irreconcilable differences and that the undersigned would be petitioning this Court for leave to withdraw as counsel.

7. A succeeding attorney is not known.
8. Scott Medical has been advised by the undersigned and understands that a lack of legal representation in this matter could result in a default judgment against Scott Medical.
9. A copy of this Motion is being served on Scott Medical.

WHEREFORE, Margolis Edelstein and Charles H. Saul, Esquire, and Kyle T. McGee, Esquire respectfully request that this Court grant their Motion for Leave to Withdraw as Counsel and grant them leave to withdraw their appearance for Scott Medical in this action.

**CONSENTED TO:**

SCOTT MEDICAL HEALTH CENTER, LLC

  
By: Dr. Gary Hieronimus

Scott Medical Health Center, P.C.  
2275 Swallow Hill Road  
Pittsburgh, PA 15220  
412-279-4522

Respectfully submitted,

MARGOLIS EDELSTEIN

/s/ Charles H. Saul  
CHARLES H. SAUL, ESQUIRE  
Pa. I.D. #19938

/s/ Kyle T. McGee  
KYLE T. MCGEE, ESQUIRE  
Pa. I.D. #205661  
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*Counsel for Defendant*