

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF OKLAHOMA**

ROBERT H. BRAVER, an individual,

Plaintiff,

v.

AMERIQUEST MORTGAGE COMPANY, a
Delaware corporation, et al,

Defendants.

No. CIV-04-1013-W

**APPLICATION FOR LEAVE TO
WITHDRAW BY COUNSEL FOR
LEAD TRANSFER, LLC**

AMERIQUEST MORTGAGE COMPANY, a
Delaware corporation,

Cross-Complainant,

v.

INNOVATIVE MARKETING, INC. d/b/a
LEAD EXTREME, a Washington corporation, et
al,

Cross-Defendants.

Pursuant to LCvR 83.5, counsel for defendant Lead Transfer, LLC (“Lead Transfer”), Venkat Balasubramani (of Balasubramani Law) and Darren Cook (of Helms & Underwood), hereby respectfully request that the Court enter an Order granting them leave of Court to withdraw as counsel for Lead Transfer. In further support of this Application, Balasubramani and Cook state as follows:

Authority

1. LCvR 83.5 for the United States District Court for the Western District of

Oklahoma states:

In civil cases, attorneys of record shall not withdraw from the case except by leave of the judge to whom the case is assigned, upon reasonable notice to the client and all other parties who have appeared in the case. Withdrawal of counsel may be granted subject to the conditions stated by the Court, including the condition that subsequent papers may continue to be served upon counsel for forwarding purposes or upon the Clerk of the Court, as the Court may direct, unless and until the client appears by other counsel or pro se, and any notice to the client shall so state and any filed consent of the client shall so acknowledge.

2. Mr. Balasubramani and Mr. Cook entered an appearance in this case on behalf of Lead Transfer on September 30, 2005 (Dkt. # 139). The representation of Mr. Balasubramani and Mr. Cook of Lead Transfer is governed by a written engagement letter containing, among other things, a specific provision regarding the right of counsel to withdraw from this case if Lead Transfer does not fulfill certain obligations to its counsel.

3. Lead Transfer has failed to fulfill these conditions. Lead Transfer has been given reasonable notice of the intent of Mr. Balasubramani and Mr. Cook to withdraw for the foregoing reason. By this Application, all other parties and counsel shall have been given notice as well. A copy of this document has been transmitted via certified mail to the last known address of Lead Transfer.

4. Lead Transfer has been encouraged and advised that in the event Mr. Balasubramani and Mr. Cook are granted leave to withdraw, Lead Transfer should seek alternate counsel as soon as possible.

5. Pending before the Court is a Motion to Dismiss for Lack of Personal Jurisdiction filed by Lead Transfer (Dkt. # 130). That Motion will be heard on October 11, 2006.

6. A proposed Order will be submitted herewith.

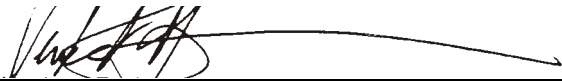
Relief Requested

For the above-stated reasons, Venkat Balasubramani and Darren Cook respectfully request that the Court enter an Order granting them leave of Court to withdraw as counsel for Lead Transfer.

DATED this 3rd day of October, 2006.

Respectfully Submitted,

BALASUBRAMANI LAW

By: 

Venkat Balasubramani (pro hac vice)

Darren R. Cook, OBA # 17277

HELMS & UNDERWOOD


Attorneys for Defendant Lead Transfer, LLC

CERTIFICATE OF SERVICE

This is to certify that on this 3RD day of October, 2006, I electronically transmitted the attached documents, **APPLICATION FOR LEAVE TO WITHDRAW BY COUNSEL FOR LEAD TRANSFER, LLC** to the Clerk of Court using the ECF system for filing. Based on the records currently on file, the Clerk of the Court will transmit a Notice of Electronic Filing to the following ECF registrants:

<p>David Humphreys Luke J. Wallace Humphreys Wallace Humphreys 1724 E 15th St Tulsa, OK 74104 918-747-5300 918-747-5311 (fax) David@hwh-law.com Luke@hwh-law.com Attorneys for Plaintiff, Robert H. Braver</p>	<p>Michael R. McKee McKee Law Firm P O Box 1351 Norman, OK 73070 405-360-2322 405-366-6416 (fax) mike@mckeelawfirm.com Attorney for Plaintiff, Robert H. Braver</p>
<p>Kalley R. Aman Michael J. Cereseto Buchalter Nemer 1000 Wilshire Blvd, Suite 1500 Los Angeles, CA 90017 213-891-0700 213-896-0400 (fax) kaman@buchalter.com mcereseto@buchalter.com Attorneys for Defendant, Ameriquest Mortgage Company</p>	<p>Robert A. Nance Terry D. Kordeliski Riggs Abney Neal Turpen Orbison Lewis 5801 N Broadway Ave, Suite 101 Oklahoma City, OK 73118 405-843-9909 405-842-2913 (fax) rnance@riggsabney.com TKordeliski@RiggsAbney.com Attorneys for Defendant, Ameriquest Mortgage Company</p>
<p>Steven J. Adams John D. Russell Fellers Snider Blankenship Bailey & Tippens 321 S Boston Ave, Suite 800 Tulsa, OK 74103-3318 918-599-0621 918-583-9659 (fax) sadams@fellerssnider.com jrussell@fellerssnider.com Attorneys for Defendant, Go Apply Inc. and The Loan Page Inc.</p>	<p>Marie S. Johnston Phillip L. Free, Jr. Crowe & Dunlevy 20 N Broadway Ave, Suite 1800 Oklahoma City, OK 73102 405-235-7700 johnstom@crowdunlevy.com freephil@crowedunlevy.com Attorneys for Defendant, Innovative Marketing, Inc. d/b/a Lead Extreme</p>

<p>Richard L. Rose Miller Dollarhide 100 Park Ave, 2nd Floor Oklahoma City, OK 73102-1010 405-236-8541 405-235-8130 (fax) rose@millerdollarhide.com Attorney for Defendant, Impact Web Enterprises Inc.</p>	<p>Arthur F. Hoge, III Brinda K. White Christopher W. Cotner Mee Mee & Hoge LLP 1900 NW Expressway, Suite 1400 Oklahoma City, OK 73118 405-848-9100 405-848-9101 (fax) afhoge@meehoge.com bkw@meehoge.com cwc@meehoge.com Attorneys for Defendant, Lead Association Corporation</p>
<p>Darren R.. Cook Helms & Underwood 120 North Robinson Avenue, Suite 2500 Oklahoma City, OK 73102 405-319-0700 405-319-9292 (fax) darren@helmsunderwood.com Attorney for Defendant, Lead Transfer, LLC</p>	<p>Lance E. Schneiter Tomlinson & O'Connell PC 211 North Robinson Avenue, Suite 450 Oklahoma City, OK 73102 405-606-3350 866-633-6165 (fax) lances@tomlinsonoconnell.com Attorney for Defendant, MoneyNest Holdings Inc.</p>
<p>Charles L. McLawhorn, III McAfee & Taft 211 North Robinson Avenue, 110th Floor Oklahoma City, OK 73102 405-235-9621 405-235-0439 (fax) chad.mclawhorn@mcafeetaft.com Attorney for Defendant, Sunburn Marketing Group LLC</p>	<p>Daniel C. Lapidus Ryan D. Lapidus Lapidus & Lapidus 211 South Beverly Drive, Suite 211 Beverly Hills, CA 90212 405-235-9621 405-235-0439 (fax) dan@lapiduslaw.com ryan@lapiduslaw.com Attorneys for Defendant, Sunburn Marketing Group LLC</p>



Venkat Balasubramani