

EQUITUS
LAW ALLIANCE
—PLLC—
ATTORNEYS AT LAW

October 9, 2023

Ectory Lawless, Esq.
Docket & Records Manager
Tennessee Public Utility Commission
Andrew Jackson State Office Building
502 Deaderick Street, Floor
Nashville, TN 37243-0001

Electronically Filed in TPUC Docket
Room on October 9, 2023 at 4:46 p.m.

Re: Application of Jackson Sustainability Cooperative for a Determination of Exemption
Docket No. 21-00061

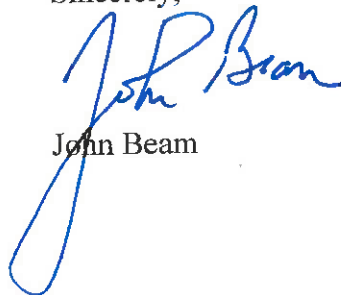
Dear Ms. Lawless:

On behalf of John Beam, David Wood, and Equitus Law Alliance, PLLC enclosed please find the original and four copies of the Motion to Withdraw as counsel of Jackson Sustainability Cooperative.

Second, enclosed please find the original and four copies of the Notice of Filing with the attached Exhibit A.

Let me know if you need any additional information.

Sincerely,



John Beam

Enclosure

**BEFORE THE TENNESSEE PUBLIC UTILITY COMMISSION
NASHVILLE, TENNESSEE**

IN RE: THE APPLICATION OF JACKSON)	
SUSTAINABILITY COOPERATIVE)	
FOR A DETERMINATION OF EXEMPTION)	DOCKET NO. 21-00061
UNDER T.C.A. § 65-4-101(6)(A)(v))	

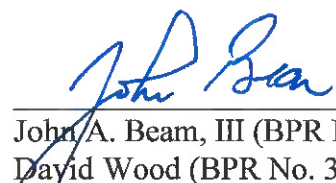
MOTION TO WITHDRAW AS COUNSEL

COMES NOW, John Beam, David Wood and Equitus Law Alliance, PLLC, counsel of record for Petitioner Jackson Sustainability Cooperative prior to its bankruptcy, and moves the Tennessee Public Utility Commission (the "Commission") to allow them to withdraw from representation of Petitioner Jackson Sustainability Cooperative.

For cause, counsel would show the Commission that Jackson Sustainability Cooperative filed Chapter 7 bankruptcy making its request for a declaratory ruling under T.C.A. §65-4-101(6)(A)(v) moot. Commission Rule 1220-01-02-.04(6) provides that permission for counsel wishing to withdraw after giving written notice to the Commission shall not be unreasonably withheld.

WHEREFORE AND ALL FOR WHICH, John Beam, David Wood, and Equitus Law Alliance, PLLC requests the Commission grant this Motion and allow them to withdraw as counsel.

Respectfully submitted,



John A. Beam, III (BPR No. 11796)
David Wood (BPR No. 35489)

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been served via U.S.

Mail, postage prepaid, and by email to the following this 6th day of October, 2023.

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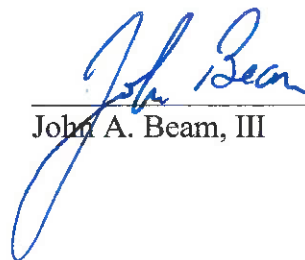
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