

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re

PARETEUM CORPORATION, *et al.*,

Debtors.

Chapter 11

Case. No.: 22-10615 (LGB)

(Jointly Administered)

Related to Docket Nos. 53, 501, and 521

CERTIFICATE OF NO OBJECTION

I, Maura I. Russell, Esq. of Montgomery McCracken Walker & Rhoads LLP, counsel to Channel Ventures Group, LLC (the “CVG” or the “Client”), hereby certify as follows:

1. On July 18, 2023, CVG filed and served its Motion (the “Motion”) for an Order granting the withdrawal of David M. Banker, Maura I. Russell, and the law firm of Montgomery McCracken Walker & Rhoads LLP (“MMWR”) as attorneys of record for the Client in connection with the above-captioned case (the “Case”).

2. Appropriate notice of the Motion was given to the parties. [Docket No. 501-3].

3. The deadline to object to the Motion was August 3, 2023. More than forty-eight hours has passed after the expiration of the time to file an objection.

4. As of today, August 7, 2023, no objection, responsive pleading, or request for a hearing with respect to the Motion has been filed or served.

5. On August 7, 2023, in response to the Court’s request that MMWR supplement the Motion with additional factual detail as to the “cause” required under Local Rule 2090-1(e), MMWR filed the Declaration of Maura I. Russell in Further Support of Motion for Entry of an Order, Pursuant to Local Bankruptcy Rule 2090-1(e), to Withdraw as Attorneys of Record [Docket No. 521].

6. MMWR requests that the Court enter an Order, substantially in the form attached hereto as **Exhibit A**, (i) granting the relief sought in this Motion and (ii) granting such other and further relief as the Court may deem just and proper.

7. The undersigned counsel for the CVG is available to respond to any questions the Court may have regarding the Proposed Order. Absent questions, the undersigned counsel respectfully requests that the Court enter the Proposed Order at its earliest convenience.

Dated: August 7, 2023

Respectfully submitted,

**MONTGOMERY McCracken Walker &
Rhoads LLP**

/s/ Maura I. Russell

Maura I. Russell, Esq.

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Exhibit A – Proposed Order

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**ORDER GRANTING MOTION TO WITHDRAW AS ATTORNEYS
OF RECORD, PURSUANT TO LOCAL BANKRUPTCY RULE 2090-1(e).**

THIS MATTER having been brought before the Court on *Motion for Entry of an Order, Pursuant to Local Bankruptcy Rule 2090-1(e), to Withdraw as Attorneys of record* (the “Motion”) of David M. Banker, Maura I. Russell, and the law firm of Montgomery McCracken Walker & Rhoads LLP; and the Court having reviewed the Motion and considered this matter pursuant to Local Bankruptcy Rule 2090-1(e) of the Local Rules of the United States Bankruptcy Court for the Southern District of New York; and for good cause shown; and a hearing to consider the Motion having been held before this Court on August 10, 2023 (the “Hearing”); it is hereby

ORDERED that the Motion of David M. Banker, Esq., Maura I. Russell, Esq., and the law firm of Montgomery McCracken Walker & Rhoads LLP to Withdraw as Attorneys of Record to Channel Ventures Group, LLC in the above-captioned bankruptcy case (the “Case”) is granted; and it is further

ORDERED that the request for the removal of David M. Banker, Esq and Maura I. Russell, Esq. and the law firm of Montgomery McCracken Walker & Rhoads LLP on behalf of Channel Ventures Group, LLC from all service lists in the Case, including all service lists maintained by Kurtzman Carson Consultants LLC, claims agent, and the Court’s ECF notification system be and is hereby granted; and it is further

ORDERED that the Court retains jurisdiction with respect to all matters arising from or related to the implementation of this Order.