BEFORE THE STATE CORPORATION COMMISSION OF THE STATE OF KANSAS

In the Matter of the Failure of Clark Energy,)	
LLC (Operator) to comply with K.A.R.)	
82-3-111 at Seventy-Three Wells in Chautauqua)	Docket No. 22-CONS-3033-CPEN
and Montgomery Counties, Kansas.)	

MOTION TO WITHDRAW AS COUNSEL AND MOTION TO WITHDRAW REQUEST FOR HEARING

Clark Energy, LLC states as follows in support of its Motions:

- 1. Clark Energy, LLC hereby withdraws its request for hearing filed in the captioned matter on August 20, 2021.
- 2. Keith A. Brock, Anderson & Byrd, LLP, moves the Commission for leave to withdraw as counsel for Clark Energy, LLC.
- 3. Keith A. Brock, Anderson & Byrd, LLP has appeared of record in this proceeding as attorney for Clark Energy, LLC.
- 4. Clark Energy, LLC has requested Keith A. Brock, Anderson & Byrd, LLP, resign from representation of such entity in this matter.
- 5. That it is reasonable and necessary to allow Keith A. Brock, Anderson & Byrd, LLP, to withdraw at this time; none of the parties are disadvantaged by allowing the withdraw of Keith A. Brock, Anderson & Byrd, LLP.
- 6. The withdraw of Keith A. Brock, Anderson & Byrd, LLP will leave Clark Energy, LLC without counsel.
- 7. Keith A. Brock, Anderson & Byrd, LLP has admonished Clark Energy, LLC that it is personally responsible for complying with all orders of the Commission and time limitations

established by Presiding Officer Order Setting Procedural Schedule.

- 8. A date has not been set for a hearing in this matter, and Clark Energy, LLC's election to withdraw its request for hearing in this matter renders moot any presently existing deadlines which have been set in this docket.
- 9. The current mailing address for Clark Energy, LLC is 1525 S. Evergreen, Chanute, KS 66720.
- 10. Counsel for Clark Energy, LLC, has conferred with staff attorney Tristan Kimbrell concerning this motion and Tristan Kimbrell has indicated that he has no objection to the granting of the relief requested in this motion.

Keith A. Brock, #24130

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the above and foregoing was sent via electronic mail this 15th day of November, 2021, addressed to:

Randy Clark Tristan Kimbrell Troy Russell

<u>rw_clark@yahoo.com</u> <u>t.kimbrell@kcc.ks.gov</u> <u>t.russell@kcc.ks.gov</u>

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Keith A. Brock