

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

In re ) Chapter 11  
)  
EDISON MISSION ENERGY ) Case No. 12-49219  
)  
) Hon. Jacqueline P. Cox  
)  
) **Hearing Date: June 15, 2016**  
) **Hearing Time: 9:30 a.m.**  
) **Courtroom: 680**

**NOTICE OF MOTION**

On **June 15, 2016** at **9:30 a.m.**, or as soon thereafter as counsel may be heard, I shall appear before Judge Jacqueline P. Cox in Courtroom 680, Dirksen Federal Courthouse, 219 S. Dearborn, Chicago, Illinois, and shall then and there present the attached **MOTION FOR LEAVE TO WITHDRAW APPEARANCE OF COUNSEL**, a copy of which is hereby served upon you.

Dated: June 8, 2016

**KPMG LLP**

By: /s/ William G. Cross  
One of its Attorneys

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**CERTIFICATE OF SERVICE**

The undersigned attorney states that on June 8, 2016 a copy of the attached:

**NOTICE OF MOTION  
and  
MOTION FOR LEAVE TO WITHDRAW  
APPEARANCE OF COUNSEL**

will be served on all counsel in accordance with the General Order on Electronic Case Filing and subject to the provisions of Fed. R. Civ. P. 5(b)(3), the Notice of Electronic Filing that is issued through the court's Electronic Case Filing System will constitute service under Fed. R. Civ. P. 5(b)(2)(D) and Fed. R. Crim. P. 49(b) as to all Filing Users in a case assigned to the court's Electronic Case Filing System.

By:     /s/ William G. Cross

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**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

In re ) Chapter 11  
)  
EDISON MISSION ENERGY ) Case No. 12-49219  
)  
) Hon. Jacqueline P. Cox

**MOTION FOR LEAVE TO WITHDRAW APPEARANCE OF COUNSEL**

William G. Cross hereby moves this Court for leave to withdraw his appearance as counsel in this matter for KPMG LLP. William G. Cross has resigned his employment with Figliulo & Silverman, P.C., and will not be in a position to continue to represent KPMG LLP. KPMG LLP will not be prejudiced by the withdrawal of William G. Cross, because the attorneys of Figliulo & Silverman, P.C. will continue to represent KPMG LLP in this matter. This request will not cause any undue delay or prejudice any party to this proceeding.

WHEREFORE, William G. Cross respectfully requests the Court grant him leave to withdraw his appearance in the above-captioned case.

Dated: June 8, 2016

**KPMG LLP**

By: /s/ William G. Cross  
One of its Attorneys

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