

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

In re:)	
)	Chapter 11
EDISON MISSION ENERGY, <u>et al.</u> , ¹)	Case No. 12-49219 (JPC)
)	
Debtors.)	(Jointly Administered)

NOTICE OF MOTION

TO: See Attached Certificate of Service

PLEASE TAKE NOTICE that on Thursday, December 22, 2016 at 9:30 a.m., or as soon thereafter as counsel may be heard, I shall appear before the Honorable Judge Jacqueline Cox in Courtroom 680 at the United States Bankruptcy Court, Eastern Division, located at 219 S. Dearborn Street, Chicago, Illinois 60604, to present the **Motion for Leave of Court to Withdraw as Attorney**, a copy of which is attached herewith and served upon you.

By: /s/ Matthew A. Clemente
Matthew A. Clemente
Sidley Austin LLP
One South Dearborn Street
Chicago, Illinois 60603
Telephone: (312) 853-7000
Facsimile: (312) 853-7036
Email: mclemente@sidley.com

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, include: Edison Mission Energy (1807); Camino Energy Company (2601); Chestnut Ridge Energy Company (6590); Edison Mission Finance Co. (9202); Edison Mission Energy Fuel Services, LLC (4630); Edison Mission Fuel Resources, Inc. (3014); Edison Mission Fuel Transportation, Inc. (3012); Edison Mission Holdings Co. (6940); Edison Mission Midwest Holdings Co. (6553); EME Homer City Generation L.P. (6938); Homer City Property Holdings, Inc. (1685); Midwest Finance Corp. (9350); Midwest Generation EME, LLC (1760); Midwest Generation, LLC (8558); Midwest Generation Procurement Services, LLC (2634); Midwest Peaker Holdings, Inc. (5282); Mission Energy Westside, Inc. (0657); San Joaquin Energy Company (1346); Southern Sierra Energy Company (6754); and Western Sierra Energy Company (1447). The location of parent Debtor Edison Mission Energy’s corporate headquarters and the Debtors’ service address is: 3 MacArthur Place, Suite 100, Santa Ana, California 92707.

CERTIFICATE OF SERVICE

I hereby certify that on November 14, 2016, I electronically filed **Motion for Leave of Court to Withdraw as Attorney** with the Clerk of the Court using the CM/ECF system.

By: /s/ Matthew A. Clemente

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

In re:)	
)	Chapter 11
EDISON MISSION ENERGY, <u>et al.</u> , ¹)	Case No. 12-49219 (JPC)
)	
Debtors.)	(Jointly Administered)

MOTION FOR LEAVE OF COURT TO WITHDRAW AS ATTORNEY

NOW COMES Petitioner Matthew A. Clemente (“Mr. Clemente”) of Sidley Austin LLP, pursuant to Rule 2091-1 of the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the Northern District of Illinois, and moves this Court for leave to withdraw his appearance as counsel for creditors Commonwealth Edison Company/Exelon Corporation (“ComEd”) in the above-captioned bankruptcy cases.

1. Mr. Clemente of Sidley Austin LLP is counsel of record for ComEd in the above-captioned bankruptcy cases.

2. ComEd will not be prejudiced by the withdrawal of Mr. Clemente as attorneys from law firm Jenner & Block will be filing appearances on behalf of ComEd in the above-captioned cases in the near term.

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, include: Edison Mission Energy (1807); Camino Energy Company (2601); Chestnut Ridge Energy Company (6590); Edison Mission Finance Co. (9202); Edison Mission Energy Fuel Services, LLC (4630); Edison Mission Fuel Resources, Inc. (3014); Edison Mission Fuel Transportation, Inc. (3012); Edison Mission Holdings Co. (6940); Edison Mission Midwest Holdings Co. (6553); EME Homer City Generation L.P. (6938); Homer City Property Holdings, Inc. (1685); Midwest Finance Corp. (9350); Midwest Generation EME, LLC (1760); Midwest Generation, LLC (8558); Midwest Generation Procurement Services, LLC (2634); Midwest Peaker Holdings, Inc. (5282); Mission Energy Westside, Inc. (0657); San Joaquin Energy Company (1346); Southern Sierra Energy Company (6754); and Western Sierra Energy Company (1447). The location of parent Debtor Edison Mission Energy’s corporate headquarters and the Debtors’ service address is: 3 MacArthur Place, Suite 100, Santa Ana, California 92707.

3. Permitting Mr. Clemente to withdraw will not delay the present bankruptcy and is not otherwise inequitable.

WHEREFORE, Mr. Clemente respectfully requests that the Court enter an Order, in substantially the form attached hereto, allowing him to withdraw his role as attorney for creditor Commonwealth Edison Company/Exelon Corporation in the above-captioned bankruptcy cases and removing Mr. Clemente from the notice list of these cases.

Dated: November 14, 2016
Chicago, Illinois

Respectfully submitted,

By: /s/ Matthew A. Clemente
Matthew A. Clemente
Sidley Austin LLP
One South Dearborn Street
Chicago, Illinois 60603
Telephone: (312) 853-7000
Facsimile: (312) 853-7036
Email: mclemente@sidley.com

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

In re:)	
)	Chapter 11
EDISON MISSION ENERGY, <u>et al.</u> , ¹)	Case No. 12-49219 (JPC)
)	
Debtors.)	(Jointly Administered)

ORDER

This matter coming to be heard on Matthew A. Clemente’s **Motion for Leave of Court to Withdraw as Attorney** for creditors Commonwealth Edison Company/Exelon Corporation (“ComEd”) in the above-captioned case, due notice having been given, and the Court being fully advised in the premises;

IT IS HEREBY ORDERED as follows:

Mr. Clemente is withdrawn as attorney for ComEd and shall be removed from the notice list of this case.

Entered: _____
Honorable Judge Jacqueline Cox

Date: _____

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, include: Edison Mission Energy (1807); Camino Energy Company (2601); Chestnut Ridge Energy Company (6590); Edison Mission Finance Co. (9202); Edison Mission Energy Fuel Services, LLC (4630); Edison Mission Fuel Resources, Inc. (3014); Edison Mission Fuel Transportation, Inc. (3012); Edison Mission Holdings Co. (6940); Edison Mission Midwest Holdings Co. (6553); EME Homer City Generation L.P. (6938); Homer City Property Holdings, Inc. (1685); Midwest Finance Corp. (9350); Midwest Generation EME, LLC (1760); Midwest Generation, LLC (8558); Midwest Generation Procurement Services, LLC (2634); Midwest Peaker Holdings, Inc. (5282); Mission Energy Westside, Inc. (0657); San Joaquin Energy Company (1346); Southern Sierra Energy Company (6754); and Western Sierra Energy Company (1447). The location of parent Debtor Edison Mission Energy’s corporate headquarters and the Debtors’ service address is: 3 MacArthur Place, Suite 100, Santa Ana, California 92707.