

UNITED STATES OF AMERICA  
BEFORE THE FEDERAL TRADE COMMISSION  
OFFICE OF ADMINISTRATIVE LAW JUDGES

In the Matter of

TRAFFIC JAM EVENTS, LLC, a limited  
liability company

and

DAVID J. JEANSONNE II, individually and as  
an officer of TRAFFIC JAM EVENTS, LLC.

DOCKET NO. 9395

**MOTION FOR LEAVE TO WITHDRAW AS COUNSEL OF RECORD FOR  
RESPONDENTS, TRAFFIC JAM EVENTS, LLC AND DAVID J. JEANSONNE, II**

Pursuant to Commission Rule 16 CFR § 3.21(f), Respondents Traffic Jam Events, LLC (“Traffic Jam”) and David J. Jeansonne II (collectively, “Respondents”), hereby respectfully request leave to withdraw as counsel of record for Respondents in the above-captioned matter. Respondents’ are unable to continue paying for legal representation in defense of the claims asserted by the Commission, and have formally requested undersigned counsel to withdraw counsel from representing them. This Motion has been provided to Respondents.

Although Commission Rules do not specifically address the procedures governing withdrawal of counsel, the Commission may grant leave to withdrawal when appropriate. *See, e.g.*, Order Granting Motion of Max Kravitz to Withdraw as Counsel for DBS Laboratories, LLC, *In the Matter of Dynamic Health of Florida, LLC et al.*, FTC Dkt. No. 9317, 2004 FTC LEXIS 156 (Sept. 13, 2004) (McGuire, Chief Administrative Law Judge) (granting leave to withdraw for good cause); Order Granting Motion of Larry S. Gordon et al. for Leave to Withdraw as Counsel, *In the Matter of Griffin Systems et al.*, FTC Dkt. No. 9249, 1993 FTC LEXIS 46 (March 9, 1993) (same).

Counsel has discussed this issue in a meet and confer with Complainant Counsel. Complainant Counsel does not object to this request.

For the foregoing reasons, Respondents' Counsel respectfully request that the Commission GRANT this Motion for Leave to Withdraw as Counsel of Record for Respondents, Traffic Jam Events, LLC and David J. Jeansonne II, and ORDER that the Secretary is directed to withdraw the appearances of Respondent's Counsel as Counsel of Record for Traffic Jam Events, LLC and David J. Jeansonne II from the Docket and Record in this case. A Proposed Order is attached.

December 17, 2020

Respectfully submitted,

/s/ L. Etienne Balart

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**Counsel for Respondents, Traffic Jam Events,  
LLC and David J. Jeansonne II**

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**MEET AND CONFER STATEMENT**

L. Etienne Balart, Counsel for the moving party, hereby certifies that he conferred with Complainant Counsel by telephone in a good-faith effort to discuss Respondents' Counsel's Motion for Leave to Withdraw as Counsel of Record for Respondents, Traffic Jam Events, LLC ("Traffic Jam") and David J. Jeansonne II.

Complainant Counsel does not oppose this Motion.

December 17, 2020

Respectfully submitted,

*/s/ L. Etienne Balart*

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**Counsel for Respondents, Traffic Jam  
Events, LLC and David J. Jeansonne II**

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**[PROPOSED] ORDER GRANTING RESPONDENT'S COUNSEL'S MOTION FOR  
LEAVE TO WITHDRAWAL AS COUNSEL OF RECORD FOR RESPONDENT,  
TRAFFIC JAM EVENTS, LLC AND DAVID J. JEANSONNE, II**

This matter came before the Commission on December 10, 2020 upon a Motion filed by Respondent's Counsel pursuant to Commission Rule 3.22(a), 16 C.F.R. §3.22(a), and the District of Columbia Rules of Professional Conduct, for an Order granting Leave to Withdraw as Counsel of Record for Respondent Traffic Jam Events, LLC ("Traffic Jam") and David J. Jeansonne II.

Having considered this Motion and all supporting and opposition papers, and good cause appearing,

**IT IS ORDERED** that this Motion for Leave to Withdraw as Counsel of Record for Respondent Traffic Jam Events, LLC and David J. Jeansonne II is GRANTED.

**IT IS FURTHER ORDERED** that the Secretary is directed to withdraw the appearances of Respondent's Counsel as herein set forth as Counsel for said Respondent from the Docket and Record in this case.

ORDERED

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D. Michael Chappell  
Chief Administrative Law Judge

Date:

**CERTIFICATE OF SERVICE**

I hereby certify that on December 17, 2020, I caused the foregoing document to be served via the FTC's E-filing system and electronic mail to:

April Tabor  
Acting Secretary  
Federal Trade Commission  
600 Pennsylvania Ave., NW, Rm. H-113  
Washington, DC 20580

The Honorable Michael Chappell  
Administrative Law Judge  
Federal Trade Commission  
600 Pennsylvania Ave., NW, Rm. H-110  
Washington, DC 20580

Thomas J. Widor  
Sanya Shahrabi  
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Complainant Counsel

December 17, 2020

/s/ L. Etienne Balart  
L. ETIENNE BALART