IN THE CIRCUIT COURT FOR THE MCHENRY	HE TWENTY-SECOND JUDICIAL CHECOTY Ulinois COUNTY, ILLINOIS MAR 1 3 2015
PAUL DULBERG,	)
Plaintiff,	)  KATHERINE M. KEEFE  Clerk of the Circuit Court
vs.	) No. 12 LA 178
DAVID GAGNON, Individually, and as Agent of CAROLINE McGUIRE and BILL McGUIRE and CAROLINE McGUIRE and BILL McGUIRE, Individually,	.} Copy
Defendants.	)

## **NOTICE OF MOTION**

TO: VIA FIRST CLASS MAIL:

Perry Accardo
Law Office of Steven A. Lihosit

200 N. LaSalle Street, Suite 2550

Chicago, IL 60601-1092

**VIA CERTIFIED MAIL:** 

Paul Dulberg

4606 Hayden Court

McHenry, IL 60051

On March 13, 2015 at 9:00 a.m., or as soon thereafter as counsel may be heard, I shall appear before the Honorable Thomas A. Meyer or any judge sitting in his stead, in courtroom 201 in the Circuit Court of McHenry County in Woodstock, Illinois and shall then and there present MOTION TO WITHDRAW AS COUNSEL, a copy of which is hereby served upon you

## AFFIDAVIT OF SERVICE

I certify that I served this Notice by mailing to whom it is directed at approximately 5:00 p.m. on March 5, 2015 in McHenry, IL and further that the statements set forth in this Affidavit of Service are true and correct.

Hans A. Mast, Attorney for Plaintiff

LAW OFFICES OF THOMAS J. POPOVICH, P.C.

3416 West Elm Street McHenry, IL 60050 815-344-3797 Attorney ID No. 06208070

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## IN THE CIRCUIT COURT FOR THE TWENTY-SECOND JUDICIAL CIRCUIT McHENRY COUNTY, ILLINOIS

PAUL DULBERG,	)		
Plaintiff,	)		
vs.	) )	No.	12 LA 178  FILED  McHenry County, Illinois
DAVID GAGNON, Individually, and as Agent of CAROLINE McGUIRE and BILL McGUIRE and CAROLINE McGUIRE and BILL McGUIRE, Individually,	) ) ) )		MAR 1 3 2015  KATHERINE M. KEEFE Clerk of the Circuit Court
Defendants.	í		

## MOTION TO WITHDRAW AS COUNSEL

NOW COME the LAW OFFICES OF THOMAS J. POPOVICH, P.C., attorneys for the Plaintiff, PAUL DULBERG, and hereby move to withdraw as counsel for the Plaintiff in this cause pursuant to Supreme Court Rule 13. In support of said Motion, the attorneys hereby state as follows:

- 1. Communication between Plaintiff and Plaintiff's counsel has broken down resulting in an unworkable situation for both attorney and client.
- 2. By copy of this motion, Plaintiff is hereby advised that, to ensure notice of any further action in this cause, she should retain new counsel or within 21 days of the hearing of this motion and withdrawal of counsel, retain other counsel or file her own supplementary appearance with the clerk of the circuit court, stating an address at which service of notices or other papers may be had upon her.

WHEREFORE, the LAW OFFICES OF THOMAS J. POPOVICH, P.C. respectfully requests that this Court enter an Order granting the LAW OFFICES OF THOMAS J. POPOVICH, P.C. leave to withdraw as counsel for the Plaintiff, PAUL DULBERG.

Respectfully submitted,

Hans A. Mast

LAW OFFICES OF THOMAS J. POPOVICH

3416 West Elm Street McHenry, IL 60050 (815) 344-3797 Attorney No. 06208070