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

PAUL DULBERG,	)
Plaintiff,	)
v.	) Case No. 17 LA 377
THE LAW OFFICE OF THOMAS J. POPOVICH, P.C. and HANS MAST,	) ) )
Defendants.	)

## MOTION TO WITHDRAW AS COUNSEL FOR PLAINTIFF PAUL DULBERG

The Clinton Law Firm, LLC, ("The Clinton Law Firm") as attorneys for Plaintiff Paul Dulberg, respectfully request that this Court grants it leave to withdraw as counsel. In support of this Motion, The Clinton Law Firm states as follows:

- 1. Edward Clinton Jr. and Julia Williams of The Clinton Law Firm filed appearances for Paul Dulberg on November 8, 2018.
- 2. Since that time, The Clinton Law Firm has diligently prosecuted the case on behalf of Mr. Dulberg.
- 3. Due to irreconcilable differences, The Clinton Law Firm cannot continue to represent Plaintiff Paul Dulberg and it is in the best interests of all parties that The Clinton Law Firm withdraws.
- 4. Pursuant to Rule 13 of the Illinois Supreme Court Rules and Local Rule 1.4(b), a copy of the Notice of Motion and this Motion for Leave to Withdraw will be served by Certified mail, returned receipt requested, by First Class U.S. Mail, to Dulberg at his last known address and by email.
  - 6. The last known address for Dulberg is 4606 Hayden Court, McHenry, IL 60051.

7. Dulberg is advised and notified that to insure notice of any action in the above-

referenced matter, he should, within 21 days after entry of the order of withdrawal, retain other

counsel and/or file with the Clerk of the Court her supplementary appearance stating an address at

which service of notices or other papers may be had upon her.

7. This Court should grant The Clinton Law Firm, LLC leave to withdraw its

appearance as attorneys for Dulberg.

WHEREFORE, Clinton respectfully requests this Honorable Court as follows:

A. The Clinton Law Firm, LLC be granted leave to withdraw as attorneys for Dulberg;

and

B. For such other and further relief as this Court deems just and equitable.

Respectfully Submitted,

By: <u>/s/ Julia C. Williams</u>
Julia C. Williams

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