

**IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS  
COUNTY DEPARTMENT - DOMESTIC RELATIONS DIVISION**

IN RE: THE MARRIAGE OF )  
 )  
BENJAMIN J. HART, )  
 )  
Petitioner, )  
 )  
vs. )  
 )  
BETSY C. HART, )  
 )  
Respondent. )

No. 07 D 530793

*Handwritten:* DOROTHY BROWN  
*Stamp:* DOROTHY BROWN CLERK

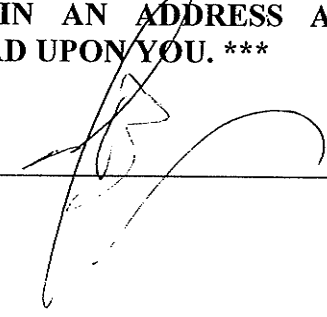
**NOTICE OF MOTION**

To:	Bradley C. Giglio, Esq. Steven H. Mevorah & Associates 134 N. Bloomingdale Rd. Bloomingdale, Illinois 60108	Cecilia H. Griffin, Esq. Griffin & McCarthy, LLP 55 West Monroe St., Ste 990 Chicago, Illinois 60603	<b><u>VIA CERTIFIED MAIL &amp; EMAIL</u></b> Mr. Ben Hart 106 W. Calendar Court, #261 LaGrange, Illinois 60525
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On November 3, 2008 at 10:00 a.m. or as soon thereafter as counsel may be heard, I shall appear before the Honorable Judge Moshe Jacobius or any judge sitting in his stead, in courtroom number 1905, Richard J. Daley Center, Chicago, Illinois and then and there present the attached **MOTION TO WITHDRAW.**

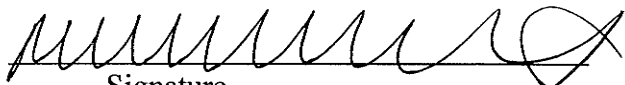
**\*\*\* PLEASE NOTE THAT TO INSURE NOTICE OF ACTION IN THIS CAUSE, YOU SHOULD RETAIN OTHER COUNSEL OR FILE WITH THE CLERK OF THE COURT, WITHIN 21 DAYS AFTER ENTRY OF THE ORDER OF WITHDRAWAL, YOUR SUPPLEMENTARY APPEARANCE STATING THEREIN AN ADDRESS AT WHICH SERVICE OF NOTICES OR OTHER PAPERS MAY BE HAD UPON YOU. \*\*\***

Attorney No. 40668  
Name: PASULKA & WHITE, LLC  
Address: 70 West Madison St., Suite 650  
City/State/Zip: Chicago, Illinois 60602  
Telephone: (312) 236-9150

Atty. Signature: 

**PROOF OF SERVICE**

The undersigned hereby certifies under penalties of perjury as provided by law pursuant to Ill. Rev. Stat. Ch. 110, par. 1-109, that the above notice and any attached pleadings were placed in the U.S. Mail properly addressed, with postage prepaid, to the parties at the addresses set forth above before the hour of 5:00 p.m. on October 28, 2008.

  
Signature

Prerna P. Pasulka  
Print Name

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COURT OF CLERK  
 CLERK  
 DOROTHY BROWN  
 CLERK

**MOTION TO WITHDRAW**

NOW COMES the movant, PASULKA & WHITE, LLC (hereinafter referred to as "PASULKA") attorney for the Petitioner, BENJAMIN HART, (hereinafter referred to as "BEN"), and asks leave of this court to withdraw from any further representation in this matter, and in support thereof, states as follows:

1. PASULKA is presently the attorney of record for BEN.
2. Pursuant to Illinois Rules of Professional Conduct Rule 1.16, an attorney may withdraw from representation of a client under various circumstances which are present here but, for professional reasons, PASULKA cannot elaborate on those circumstances.
3. Irreconcilable differences have arisen between PASULKA and BEN, making any continued representation of the client by PASULKA impossible.
4. For professional reasons, PASULKA is no longer able, nor would it be proper, for said firm to continue representing BEN's interests in this matter.
5. Illinois Supreme Court Rule 13 provides:

**"[A]n attorney may not withdraw his appearance for a party without leave of court and notice to all parties of record, and, unless another attorney is substituted, he must give reasonable notice of the time and place of the presentation of the motion for leave to withdraw, by personal service, or by certified mail at his last known business or residence address. Such notice shall advise said party that to ensure notice of any action in said cause, he should retain other counsel therein or file with the clerk of the court, within 21 days of the entry of the order of withdrawal, his supplementary appearance stating therein an address at which service of notices or other papers may be had upon him."**

6. Proper notice has been sent to all parties and attorneys notifying them that this Motion to Withdraw would be presented on this date.

7. PASULKA has given the client reasonable notice of the time and place of the presentation of this motion for leave to withdraw, by certified mail and email, at the client's last known residential address, 106 W. Calendar Court, #261, LaGrange, IL 60525.

8. A letter has been sent to the client with this motion in compliance with Supreme Court Rule 13 advising the client to retain other counsel or file an appearance with the Clerk of the Court, within 21 days after the entry of this Order of Withdrawal, stating therein an address where notices may be served.

9. This motion is not interposed for purposes of delay or harassment and it is not inequitable on any party to this action.

WHEREFORE, your movant, PASULKA & WHITE, LLC, respectfully request that this court grant it leave to withdraw as the attorney of record for the Petitioner, BENJAMIN HART, in this cause of action and for any other and further relief that this court deems just and equitable.

Respectfully submitted,

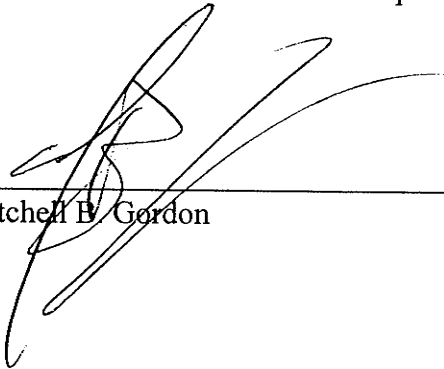
PASULKA & WHITE, LLC

By:   
\_\_\_\_\_  
Mitchell B. Gordon


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70 West Madison Street, Suite 650  
Chicago, Illinois 60602  
(312) 236-9150  
Atty No. 40668

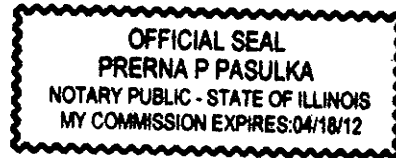
STATE OF ILLINOIS        )  
  ) SS  
COUNTY OF COOK         )

Mitchell B. Gordon, being first duly sworn on oath, deposes and states that he is the attorney of record in the above and foregoing cause of action, that he has read the above Motion by him subscribed and knows the same to be true in substance and in fact and is not interposed for purposes of harassment or delay.

  
\_\_\_\_\_  
Mitchell B. Gordon

SUBSCRIBED and SWORN to  
before me this 28<sup>th</sup> day  
of October, 2008.

  
\_\_\_\_\_  
Notary Public



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70 West Madison Street, Suite 650  
Chicago, Illinois 60602  
(312) 236-9150  
Atty No. 40668