

**IN THE UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF ILLINOIS
URBANA DIVISION**

Benjamin Mann and)	
Samantha M. Wade,)	
)	
Plaintiffs,)	
)	Case No. 17-cv-2300
v.)	
)	
City of Urbana Police Officers)	
Jennifer Difanis, Colby G. Wright, Sara M. Links,)	
Seth R. King, Jay Loschen, Chad Burnett,)	
Don C. McClellan, Adam Marcotte,)	
John Franquemont, Sgt. Zach Mikalik, and)	
as yet Unknown Officers,)	
the City of Urbana, a municipal corporation,)	
University of Illinois Police Officer Chris Elston,)	
and Board of Trustees of the University of Illinois,)	
)	
Defendants.)	

**PLAINTIFFS’ MOTION TO WITHDRAW AS ATTORNEY
FOR PLAINTIFF SAMANTHA M. WADE**

NOW COME Plaintiff Samantha Wade’s attorneys, Shneur Z. Nathan, Avi T. Kamionski, and Natalie Y. Adeeyo, and move this Honorable Court to grant their Motion to Withdraw as Attorney for Plaintiff Samantha M. Wade, and in support thereof, state as follows:

1. Plaintiff Samantha Wade (hereinafter “Plaintiff Wade”) filed this case on December 5, 2017, setting forth claims of illegal search, conspiracy, malicious prosecution, and intentional infliction of emotional distress pursuant to 42 USC § 1983 federal law and state law.
2. Written discovery has not been completed. Plaintiff Wade’s attorneys have made numerous attempts to get in contact with her to complete written discovery to no avail.
3. Fact discovery is set to close by April 1, 2019. Plaintiff Wade’s responses to Defendants’ written discovery were due on May 25, 2018.

4. Based on the inability to get in touch with Plaintiff Wade, the movants believe they are unable to effectively and properly continue in their representation of Plaintiff Wade.

5. Plaintiff Wade has been notified of the intention of the foregoing attorneys to withdraw as her counsel, and she has been provided notice of this motion.

6. Shneur Z. Nathan, Avi T. Kamionski, and Natalie Y. Adeeyo seek to withdraw as Plaintiff Wade's attorneys in this case.

7. The undersigned requests that Plaintiff Wade be provided 45 days to obtain new counsel.

All further notices should be sent to:

Ms. Samantha M. Wade
810 Oakland Ave
Apt. 201
Urbana, IL 61802

WHEREFORE, Plaintiff Wade's attorneys, Shneur Z. Nathan, Avi T. Kamionski, Natalie Y. Adeeyo, pray that this Honorable Court enter an order granting their motion to withdraw their appearances on behalf of Plaintiff Wade in this manner.

Date: July 23, 2018

Respectfully submitted,

By: /s/ Natalie Y. Adeeyo
Natalie Adeeyo, Att. # 6323542

Shneur Z. Nathan
Avi T. Kamionski
Natalie Y. Adeeyo
Nathan & Kamionski LLP
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(312) 612-1072

CERTIFICATE OF SERVICE

I, Natalie Adeeyo, an attorney, hereby certify that on this day, the 23rd day of July 2018, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system which will send notification of such to the following:

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I am sending a copy of the motion and notice of motion to Samantha Wade's address by U.S. Mail.

/s/ Natalie Y. Adeeyo