

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MINNESOTA**

IN RE GUIDANT CORP. IMPLANTABLE DEFIBRILLATORS PRODUCTS LIABILITY LITIGATION	MDL No. 05-1708 (DWF/AJB)
Craig Collins, et al.  Plaintiffs,  v.  Guidant Corporation, et al.,  Defendants.	<b>APPLICATION TO WITHDRAW AS COUNSEL OF RECORD</b>  Case No. 0:07-CV-02734

**RELATIVE TO PLAINTIFFS JAMES JONES AND AGNUS JONES ONLY**

Pursuant to Rule 83.7(b) of the Local Rules of the United States District Court for the District of Minnesota, the undersigned attorney hereby requests the Court and counsel that Rachel Abrams, currently listed as counsel of record for Plaintiffs James Jones and Agnus Jones wishes to withdraw as counsel for Plaintiffs James Jones and Agnus Jones in this case for the following reasons:

Despite multiple and diligent efforts by counsel to contact clients and obtain their signed release of the defendant in this matter, Plaintiffs, after previously agreeing to participate in the settlement, now refuse to sign the required release and will not communicate any further with counsel. Plaintiffs will not return phone calls and ignore the voice mails left for them. Plaintiffs have been advised that this firm intends to withdraw from representation and still have not responded.

Please remove this firm's name as counsel for Plaintiffs but allow these plaintiffs to proceed "Pro Se."

A copy of this motion and the accompanying Notice of Withdrawal has been served upon Plaintiffs at their home address.

DATED: April 29, 2008

HERSH & HERSH  
A Professional Corporation

By /s/ Rachel Abrams  
Rachel Abrams

CA Bar Number 209316  
Attorney for Plaintiffs  
Hersh & Hersh  
601 Van Ness Avenue, Suite 2080  
San Francisco, CA 94102-6388  
Telephone: (415) 441-5544  
Facsimile: (415) 441-7586

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MINNESOTA**

IN RE GUIDANT CORP. IMPLANTABLE DEFIBRILLATORS PRODUCTS LIABILITY LITIGATION	MDL No. 05-1708 (DWF/AJB)
Craig Collins, et al.  Plaintiffs,  v.  Guidant Corporation, et al.,  Defendants.	<b>CERTIFICATE OF SERVICE</b>  Case No. 0:07-CV-02734

I certify that copies of and APPLICATION TO WITHDRAW AS COUNSEL OF RECORD and a NOTICE OF WITHDRAWAL, were filed and served on this 29<sup>th</sup> day of April, 2008, on all counsel of record through the court's ECF service and upon the plaintiffs James Jones and Agnus Jones at their last known address of:

James Jones and Agnus Jones  
1112 Cornerstone Drive  
Yardley, PA 19067

DATED: April 29, 2008

HERSH & HERSH  
A Professional Corporation

By /s/ Rachel Abrams

Rachel Abrams  
CA Bar Number 209316  
Attorney for Plaintiffs  
Hersh & Hersh  
601 Van Ness Avenue, Suite 2080  
San Francisco, CA 94102-6388  
Telephone: (415) 441-5544  
Facsimile: (415) 441-7586