UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

In re: GUIDANT CORP. IMPLANTABLE DEFIBRILLATORS PRODUCTS LIABILITY LITIGATION

MDL No. 05-1708 (DWF/AJB)

EDWARD BARON, et al.,

Plaintiff,

v.

GUIDANT CORPORATION, et al.,

Defendants,

Individual case No. 07-cv-02824

THIS DOCUMENT RELATES TO:
Plaintiff, THOMAS CURRIERE only

APPLICATION TO WITHDRAW AS COUNSEL OF RECORD

Pursuant to Rule 83.7(b) of the Local Rules of the United States District Court for the District of Minnesota, counsel for Thomas Curriere, Robinson, Calcagnie & Robinson, and all attorneys of record in this matter, seek to withdraw as counsel for Thomas Curriere, the Plaintiff in the above captioned matter for the following reason(s):

Despite multiple and diligent efforts by counsel to contact the Plaintiff and obtain his signed release of the defendant in this matter, Plaintiff, having originally verbally agreed to participate in the settlement, now advises that he refuses to sign the required release and intends to proceed "Pro Se". Plaintiff was advised on March 14 and April 28, 2008, in conversations with counsel and referring counsel and in writing on those same dates that counsel intends to withdraw from representation, and he acknowledges the same.

A Notice of Motion of Withdrawal has been sent via United States Postal Service to the attention of Plaintiff, Thomas Curriere, at his last known address.

Wherefore, Robinson, Calcagnie & Robinson and all attorneys of record in this matter, request they be allowed to withdraw as counsel of record.

Dated: April 29, 2008

Mark P. Robinson, Jr.

Mark P. Robinson, Jr.
ROBINSON, CALCAGNIE & ROBINSON
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Newport Beach, CA 92660
949 720 1288 / 949 720 1292 (fax)
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on April 29, 2008, the foregoing was filed electronically with the Clerk of the Court to be served by operation of the Court's ECF/PACER electronic filing system to all counsel of record and served via Certified Mail upon Thomas Curriere at his last known address, 24600 Old Forge Lane, Apt. 43, Las Vegas, NV 89121.

Mark P. Robinson, Jr.

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THIS DOCUMENT RELATES TO:
Plaintiff THOMAS CURRIERE only

NOTICE OF MOTION OF WITHDRAWAL

Pursuant to Rule 83.7(b) of the Local Rules of the United States District Court for the District of Minnesota, counsel for Jose Ramos, Robinson, Calcagnie & Robinson, and all attorneys of record in this matter, hereby give notice of motion to withdraw as counsel for Jose Ramos, the Plaintiff in the above captioned matter as of this date.

Dated: April 29, 2008

Mark P. Robinson, Jr.

Mark P. Robinson, Jr.
ROBINSON, CALCAGNIE & ROBINSON
620 Newport Center Drive Seventh Floor
Newport Beach, CA 92660
949 720 1288 / 949 720 1292 (fax)
mrobinson@rcrlaw.net

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on April 29, 2008, the foregoing was filed electronically with the Clerk of the Court to be served by operation of the Court's ECF/PACER electronic filing system to all counsel of record and served via certified mail upon Jose Ramos at his last known address, 209 W 46th St, Los Angeles, CA 90037.

Mark P. Robinson, Jr.

MARK P. ROBINSON, JR.