

**UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA**

In re: GUIDANT CORP. IMPLANTABLE  
DEFIBRILLATORS PRODUCTS LIABILITY  
LITIGATION

MDL No. 0:05-md-01708-DWF-AJB

Case No: 0:07-cv-03825-DWF-AJB

Alexander, et al.  
Plaintiff(s)

**MOTION TO WITHDRAW AS  
COUNSEL OF RECORD WITHOUT  
SUBSTITUTION FOR  
PLAINTIFF JOHN BROWN**

v.

Guidant Corporation, et al.  
Defendant(s).

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**MOTION TO WITHDRAW AS COUNSEL OF RECORD WITHOUT  
SUBSTITUTION FOR PLAINTIFF JOHN BROWN**

Pursuant to Rule 83.7(b) of the Local Rules of the United States District Court for the District of Minnesota, counsel for John Brown, Brown & Crouppen, P.C.; Seth S. Webb; Aylstock, Witkin, Kreis & Overholtz, PLLC; Barrios, Kingsdorf & Casteix, LLP; Lundy & Davis; Andrus & Boudreaux, PLC; and all other attorneys of record in this matter hereby request the Court and counsel allow for the withdrawal as counsel of record for John Brown. The undersigned currently are listed as counsel for John Brown and of counsel and hereby request withdrawal and in support thereof state:

Counsel has discussed with Plaintiff the status of the proceedings, the existence of a proposed settlement, the likely recovery under the settlement, the necessary steps to remain part of that settlement, the deadline for meeting the requirements for remaining part of the settlement, including deadline for providing claimant's release and declaration. Plaintiff has refused to provide release of the defendant in this matter. Plaintiff's failure to sign has created irreconcilable differences with counsel.

A copy of this motion will be served upon Plaintiff at his last known address of 1329 N. Wheeler Ave., Springfield, IL 62702.

Dated: June 10, 2008

Respectfully submitted,

BROWN AND CROUPPEN, P.C.

/s/ SETH SHARROCK WEBB

Seth Sharrock Webb, MN Bar No. 0387252

720 Olive Street, Suite 1800

St. Louis, Missouri 63101

314-421-0216

314-421-0359 facsimile

***ATTORNEY FOR PLAINTIFF JOHN  
BROWN***

Aylstock, Witkin, Kreis & Overholtz, PLLC

803 North Palafox St.

Pensacola, Florida 32501

850-202-1010

***OF COUNSEL FOR PLAINTIFF JOHN  
BROWN***

Barrios, Kingsdorf & Casteix, LLP

701 Poydras Street, Suite 3650

New Orleans, LA 70139-3650

504-524-3300

***OF COUNSEL FOR PLAINTIFF JOHN  
BROWN***

Lundy & Davis

501 Broad Street

Lake Charles, LA 70601

337-439-0707

***OF COUNSEL FOR PLAINTIFF JOHN  
BROWN***

Andrus & Boudreaux, PLC

1775 Sherman Street, 31<sup>st</sup> Floor

Denver, CO 80203

303-376-6360

***OF COUNSEL FOR PLAINTIFF JOHN  
BROWN***

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing Motion to Withdraw As Counsel of Record Without Substitution has been filed electronically on this 10<sup>th</sup> day of June 2008 using the Court's CM/ECF system and sent via USPS Certified Mail to Plaintiff John Brown at his last known address of:

1329 N. Wheeler Ave.,  
Springfield, IL 62702

Dated: June 10, 2008

Respectfully submitted,  
BROWN AND CROUPPEN, P.C.

/s/ SETH SHARROCK WEBB  
Seth Sharrock Webb, MN Bar No. 0387252  
720 Olive Street, Suite 1800  
St. Louis, Missouri 63101  
314-421-0216  
314-421-0359 facsimile  
**ATTORNEY FOR PLAINTIFF JOHN  
BROWN**