

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA

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In re: GUIDANT CORP. IMPLANTABLE  
DEFIBRILLATORS PRODUCTS  
LIABILITY LITIGATION

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MDL No. 05-1708 (DWF/AJB)

**NOTICE OF MOTION  
TO WITHDRAW**

Case No: 07-cv-3092 (DWF/AJB)

John B. Blake, et al.,

Plaintiffs,

v.

GUIDANT CORPORATION, et al.,

Defendants,

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**THIS DOCUMENT RELATES TO:  
Plaintiff, JUNE E. DRUMMOND only**

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Pursuant to Rule 83.7 of the Local Rules of the United States District Court for the District of Minnesota, counsel for June E. Drummond, Charles H. Johnson & Associates, and all attorneys of record in this matter, hereby give notice of motion to withdraw as counsel for June E. Drummond, the Plaintiff in the above-captioned matter as of this date.

Date: June 10, 2008

/s/ Charles H. Johnson

Charles H. Johnson (MN Bar #50696)

Mimi B. Hua (MN Bar #343997)

Neal A. Eisenbraun (MN Bar #14860X)

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**APPLICATION TO WITHDRAW  
AS COUNSEL OF RECORD**

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**THIS DOCUMENT RELATES TO:  
Plaintiff, JUNE E. DRUMMOND only**

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Pursuant to Rule 83.7 of the Local Rules of the United States District Court for the District of Minnesota, counsel for June E. Drummond, Charles H. Johnson & Associates, and all attorneys of record in this matter, seek to withdraw as counsel for June E. Drummond, 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 a properly signed Release of the defendant in this matter, Plaintiff, has not properly signed the required release. Plaintiff's failure to sign has created irreconcilable differences with counsel.

A copy of this motion will be served upon Plaintiff via United States Postal Service to the attention of Plaintiff, June E. Drummond, at her last known address.

