

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

In Re: GUIDANT CORP. IMPLANTABLE
DEFIBRILLATORS PRODUCTS
LIABILITY LITIGATION

MDL No. 05-1708 (DWF/AJB)

This pleading relates to:
Allen, et. al. v. Guidant Corporation, et. al.
Individual Case No. 0:07-cv-04301-DWF-AJB

**MOTION TO WITHDRAW AS
COUNSEL OF RECORD
WITHOUT SUBSTITUTION
FOR PLAINTIFF MARY
LANHAM**

Plaintiff, Mary Lanham

**MOTION TO WITHDRAW AS COUNSEL OF RECORD WITHOUT
SUBSTITUTION FOR PLAINTIFF MARY LANHAM**

Pursuant to Rule 83.7(b) of the Local Rules of the United States District Court for the District of Minnesota, counsel for Mary Lanham, 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 Mary Lanham. The undersigned currently are listed as counsel for Mary Lanham 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 her last known address of 2038 N. Midway, Lot 206, Normal, IL 61761.

Dated: October 15, 2008

Respectfully submitted,

BROWN AND CROUPPEN, P.C.

/s/ SETH SHARROCK WEBB

Seth Sharrock Webb, MN Bar No. 0387252

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***OF COUNSEL FOR PLAINTIFF MARY
LANHAM***

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 15th day of October 2008 using the Court's CM/ECF system and sent via USPS Certified Mail to Plaintiff Mary Lanham at her last known address of:

Mrs. Mary Lanham
2038 N. Midway, Lot 206
Normal, IL 61761

Dated: October 15, 2008

Respectfully submitted,
BROWN AND CROUPPEN, P.C.

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