

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

IN RE: Stryker Rejuvenate and ABG
II Hip Implant Products Liability
Litigation

MDL No. 13-2441 (DWF/FLN)

This Document Relates to:

ROCKY HALE,

Plaintiff(s),

vs.

HOWMEDICA OSTEONICS d/b/a
STRYKER ORTHOPAEDICS,
STRYKER CORP., STRYKER SALES
CORPORATION and STRYKER
IRELAND LIMITED,

Defendants.

Individual Case No.:
0:14-cv-02285-DWF-FLN

MOTION TO WITHDRAW

COMES NOW Plaintiff's counsel, Don McKenna, and moves the Court to enter an Order granting his withdrawal as plaintiff's counsel in the above-styled case. As grounds for said motion, counsel states that plaintiff has terminated attorney-client relationship without cause and expressed his desire to seek new counsel. The undersigned has filed a Notice of Attorney's Lien. The plaintiff has

been informed that counsel will be withdrawing and has been informed of the lien. The plaintiff has been informed that the undersigned counsel will ask the Court for 60 days for the plaintiff to obtain new counsel and have that counsel file a notice of appearance.

WHEREFORE, the undersigned counsel moves the Court to enter an Order granting his withdrawal and allowing the plaintiff 60 days to obtain new counsel and have that counsel file a notice of appearance for the plaintiff.

Dated: August 5, 2015

Respectfully submitted,

/s/Don McKenna
DON MCKENNA-ASB-6494-C66D
HARE, WYNN, NEWELL AND
NEWTON, LLP
2025 Third Avenue North Suite 800
Birmingham, AL 35203
Tel: (205) 328-5338
Fax: (205) 324-2164
don@hwenn.com.

CERTIFICATE OF SERVICE

I, Don McKenna, hereby certify that on this 5th day of August, 2015, I served the foregoing Notice of Attorney's Lien upon all counsel of record via the Court's CM/ECF system.

/s/Don McKenna
DON MCKENNA-ASB-6494-C66D
HARE, WYNN, NEWELL AND
NEWTON, LLP
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Birmingham, AL 35203
Tel: (205) 328-5338

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