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# Motion To Withdraw As Counsel

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*Motion To  
Withdraw As  
Counsel*      2019-11-18

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## **DEON ELLISON**

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*Michigan Court Rules  
American Bar  
Association  
Number of Exhibits: 7  
United States of  
America V. Simmons  
Ishi Press*

Court of Appeal  
Case(s): Consolidated  
Case(s): Number of  
Exhibits: 0  
United States of  
America V. Cruz  
Consolidated Case(s):  
B020995\_x005F\_x000D  
\_B025640  
**United States of  
America V. Brown**  
Court of Appeal

Case(s): F015844

**California. Supreme Court. Records and Briefs**

Received document entitled: MOTION FOR LEAVE TO WITHDRAW AS COUNSEL

*California. Court of Appeal (1st Appellate District). Records and Briefs*

Number of Exhibits: 1  
Court of Appeal

Case(s): H006057

**United States of America V. Stahl**

Number of Exhibits: 1  
Court of Appeal

Case(s): H007045

(lead) H007608

*California. Supreme Court. Records and Briefs*

The Model Rules of Professional Conduct provides an up-to-date resource for information on legal ethics. Federal, state and local courts in all jurisdictions look to the

Rules for guidance in solving lawyer malpractice cases, disciplinary actions, disqualification issues, sanctions questions and much more. In this volume, black-letter Rules of Professional Conduct are followed by numbered Comments that explain each Rule's purpose and provide suggestions for its practical application. The Rules will help you identify proper conduct in a variety of given situations, review those instances where discretionary action is possible, and define the nature of the relationship between you and your clients, colleagues and the courts.

*California. Court of Appeal (2nd Appellate District). Records and Briefs*

Court of Appeal  
Case(s): F015844  
*California. Court of Appeal (1st Appellate District). Records and Briefs*  
Number of Exhibits: 18  
*Santos V. United States of America*  
Rules included on writs of error, supersedeas; process on writs on error; transcription of records; dismissal of appeals; assignment of error; briefs of counsel; oral arguments; motions; withdrawal of papers; re-hearing of causes; contested elections; applications for original writs; admission of attorneys, etc.

**People of the State of Illinois V. Todd**

This is an appeal of an order withdrawing Sam Ware counsel for the Estate of K. Michael Goodall from appearing in this case. Counsel

for the Goodall Estate sought to withdraw after counsel for Bank of America filed three successive motions for monetary sanctions. These motions were filed by Bank of America against Counsel for the Goodall Estate and personally against the administrator of the Goodall Estate with Will annexed. These successive motions for sanctions demanded that Counsel for the Goodall Estate and the Administrator of the Goodall Estate personally both pay between \$13,000 and \$16,000 to Counsel for Bank of America. These three motions for sanctions were utterly frivolous and without basis. Their obvious propose was to frighten and intimidate counsel for the Goodall

Estate and to scare him into not zealously presenting the best arguments and to frighten him so that he would not properly present the case and would not appeal if necessary. In view of this plus the obvious hostility of the judge presiding over the case to the rightful claims of the Goodall Estate, which made it likely that these motions for sanctions which threatened the professional career of Counsel for the Goodall Estate would be granted, he filed the motion to withdraw so as to get himself off the hook on these motions for sanctions. Even after filing the motion to withdraw, the comments by Judge Busch at the final hearing on sanctions show that

Judge Busch was on the verge of ordering sanctions anyway.

**United States of America V. Croxton**

Number of Exhibits: 1

Court of Appeal

Case(s): B045779

Model Rules of

Professional Conduct

Court of Appeal

Case(s): A053348

Number of Exhibits: 1

*People of the State of Illinois V. Greer*

Court of Appeal

Case(s): C010635

Number of Exhibits: 1

*People of the State of Illinois V. Tousignant*

Court of Appeal

Case(s): C003917

United States of

America V. Salgado-

Ocampo

Number of Exhibits: 1

Court of Appeal

Case(s): B055862

**California. Supreme Court. Records and Briefs**

Court of Appeal

Case(s): B070486  
Number of Exhibits: 3  
**United States of  
America V. Cowan**

California. Court of  
Appeal (2nd Appellate  
District). Records and  
Briefs