
**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

ANNABEL K. MELONGO,)	
)	
Plaintiff,)	
)	
v.)	13-cv-04924
)	
ASA ROBERT PODLASEK, ET AL.)	The Honorable
)	John Z. Lee
)	Judge Presiding
Defendants.)	

NOTICE OF MOTION

PLEASE TAKE NOTICE, that on October 6, 2015 at 9:00 a.m. or as soon thereafter as counsel may be heard, I shall appear in the United States District Court for the Northern District of Illinois, Eastern Division before the Honorable John Z. Lee in Courtroom 1225 at the Federal Court Building at 219 S. Dearborn St., Chicago, IL 60604 shall then and there present the attached Motion for Leave to File Motion to Withdraw as Counsel *Ex Parte*

BONJEAN LAW GROUP, PLLC

BY: s/ Jennifer Bonjean

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MOTION TO FOR LEAVE TO FILE MOTION TO WITHDRAW *EX PARTE*

1. Undersigned counsel began representing Plaintiff Melongo in March, 2014 in criminal proceedings in the Circuit Court of Cook County. Plaintiff was charged with several counts of felony computer tampering charges. After a jury trial before the Honorable Circuit Court Judge Joyce, Plaintiff was acquitted of all charges on July 29, 2014. Counsel represented Plaintiff *pro bono* during those criminal proceedings.

2. On April 4, 2014, counsel filed an appearance in Plaintiff's civil case with the understanding that counsel would represent her on a contingency basis. At undersigned Counsel's request, Christopher R. Smith filed an appearance in the case as "local counsel" pursuant to local rules since undersigned counsel's primary office is based in Brooklyn, New York.

3. Counsel Bonjean (and local counsel Smith) now seek leave to withdraw as counsel for Plaintiff.

4. Counsel Bonjean believes that Plaintiff does not object to this motion but she has also not given her express consent.

5. Accordingly, counsel Bonjean's Motion to Withdraw contains a factual basis for her request to be relieved from the case that includes communications between Counsel and Plaintiff.

6. Although Counsel does not believe that the communications between she and Plaintiff are necessarily protected by the attorney-client privilege since they do not relate specifically to the allegations raised in Plaintiff's complaint, out of an abundance of caution, Counsel seeks leave to file her motion to withdraw *ex parte*.

WHEREFORE, Counsel Bonjean respectfully moves to file her motion to withdraw *ex parte*.

Respectfully Submitted,

/S/JENNIFER BONJEAN

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