

it is evident that the client will make continued representation unreasonably difficult, as contemplated in Rule 1.16(b)(6) of the Rules of Professional Conduct.

4. Further, although Melongo may not have formally terminated the undersigned as her counsel, she has stated that she intends to do so and has clearly stated that she does not wish the undersigned to represent her before the Court in this matter. Therefore, counsel is unable to continue to represent Melongo pursuant to Rule of Professional Conduct 1.16(a)(3), which provides in part that “a lawyer shall not represent a client or, where representation has commenced, shall withdraw from the representation of a client if . . . the lawyer is discharged.”

5. Melongo will not be disadvantaged if the Court grants the undersigned leave to withdraw as requested. The record on appeal has not yet been filed and the appellant has requested an extension until February 25, 2013, in which to do so. Thus, there are no impending deadlines that Melongo must meet.

6. The undersigned has served a copy of this motion on Melongo by certified mail, return receipt requested, at the only address that he has for her – a post office box – and also by email. Further, as noted above, Melongo has communicated her desire for the undersigned to withdraw by email sent to the undersigned.

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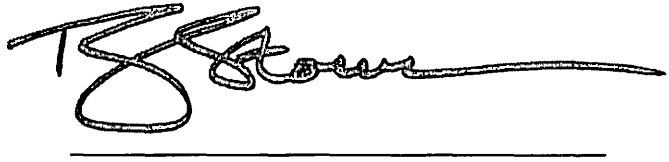
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WHEREFORE, pursuant to Illinois Supreme Court Rule 13, the undersigned respectfully requests that he be relieved of the appointment to represent defendant Annabel Melongo in the referenced matter, that he be granted leave to withdraw his appearance, and that Melongo be granted 21 days to retain other counsel or file a supplementary appearance with the clerk of the Court.

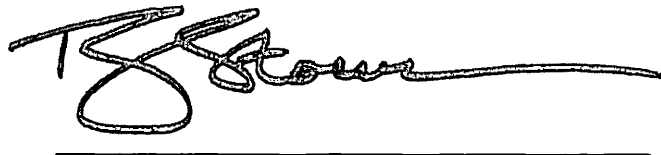
Respectfully submitted,



Timothy J. Storm
Storm Law Office
227 North Main Street
Wauconda, Illinois 60084
Telephone: 847-526-6300
ARDC No.: 6210189

VERIFICATION BY CERTIFICATION

Under penalties as provided by law pursuant to §1-109 of the Code of Civil Procedure, the undersigned certifies that the statements set forth in this instrument are true and correct, except as to matters therein stated to be on information and belief and as to such matters the undersigned certifies as aforesaid that he verily believes the same to be true.



No. 114852 - People State of Illinois, appellant, v. Annabel Melongo, appellee.

Motion by appellee, pro se, to appoint counsel. Motion allowed. Timothy J. Storm of Storm Law Office is appointed to represent the appellee in this appeal.

Order entered by the Court.

FILED

NOV 14 2012

SUPREME COURT CLERK

EXHIBIT A

RECEIVED

No. 114852

JAN 24 2013

IN THE
SUPREME COURT OF ILLINOIS

CLERK
SUPREME COURT
CHICAGO

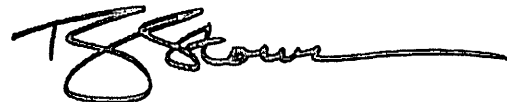
PEOPLE OF THE STATE OF ILLINOIS,)	
)	Direct Appeal from the
Plaintiff-Appellant,)	Circuit Court of Cook County, Illinois
)	
v.)	Circuit Court No. 10 CR 8092
)	
ANNABEL MELONGO,)	Hon. Steven J. Goebel,
)	<i>Judge Presiding.</i>
Defendant-Appellee.)	

NOTICE OF MOTION

TO: See attached service list

PLEASE TAKE NOTICE that on January 24, 2013, the undersigned caused to be filed with the Clerk of the Supreme Court of Illinois the **Motion Of Appellee's Appointed Counsel Timothy J. Storm For Leave To Withdraw**, a copy of which is attached and served upon you.

NOTICE TO ANNABEL MELONGO: TO INSURE NOTICE OF ANY ACTION IN THIS CAUSE, YOU SHOULD RETAIN OTHER COUNSEL OR FILE WITH THE CLERK OF THE COURT, WITHIN 21 DAYS AFTER ENTRY OF THE ORDER OF WITHDRAWAL, YOUR SUPPLEMENTARY APPEARANCE STATING AN ADDRESS AT WHICH SERVICE OF NOTICES OR OTHER DOCUMENTS MAY BE HAD UPON YOU.



Timothy J. Storm
Storm Law Office
227 North Main Street
Wauconda, Illinois 60084
Telephone: 847-526-6300
ARDC No.: 6210189

CERTIFICATE OF SERVICE

The undersigned, an attorney, certifies that he caused the **Motion Of Appellee's Appointed Counsel Timothy J. Storm For Leave To Withdraw** to be served on:

Ms. Annabel Melongo
Post Office Box 5658
Chicago, Illinois 60680

by certified mail, return receipt requested, and on:

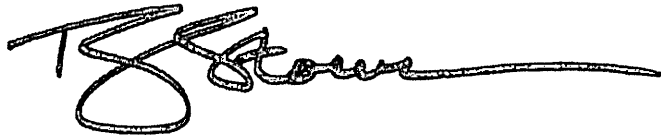
Alan J. Spellberg, Esq.
State's Attorney of Cook County
309 Richard J. Daley Center
50 West Washington Street
Chicago, Illinois 60602

and

Lisa Madigan
Attorney General of Illinois
Suite 1200
100 West Randolph Street
Chicago, Illinois 60601

by First Class mail

by placing the same in a properly addressed envelope, proper postage prepaid, and causing the same to be deposited in the United States mail at Chicago, Illinois before the hour of 5:00 p.m. on January 24, 2013.



A handwritten signature in black ink, appearing to read 'T. Storm', is written over a horizontal line.