

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

ERICH SPECHT, an individual and doing business)	
as ANDROID DATA CORPORATION, and THE)	
ANDROID’S DUNGEON INCORPORATED,)	
)	
Plaintiffs/Counter-Defendants,)	
)	
v.)	Civil Action No. 09-cv-2572
)	
GOOGLE INC.,)	Judge Harry D. Leinenweber
)	
Defendant/Counter-Plaintiff.)	

**MOTION FOR LEAVE TO
WITHDRAW AS COUNSEL FOR PLAINTIFFS**

P. Andrew Fleming, John F. Shonkwiler, Richard G. Douglass, John Haarlow, Jr. and Christopher G. Dean (collectively referred to herein as “Movants”) hereby move this Court, pursuant to Local Rules 83.17 and 83.51.16(b)(3) & (b)(4) of the United States District Court for the Northern District of Illinois (the “Local Rules”), for entry of an order granting Movants leave to withdraw as counsel of record for Erich Specht, an individual and doing business as Android Data Corporation, and The Android’s Dungeon Incorporated (collectively, “Plaintiffs”). In support of hereof, Movants state as follows:

1. This matter was filed by Plaintiffs on April 28, 2009 through their counsel Martin J. Murphy. Mr. Murphy has represented Plaintiffs throughout these proceedings.
2. In or around August 2009, Movants were retained as additional counsel to represent Plaintiffs, and, at various times since then, filed their appearances herein. Movants have represented Plaintiffs together with co-counsel Mr. Murphy since filing such appearances.
3. Pursuant to Local Rule 83.17, an “attorney of record may not withdraw . . . without first obtaining leave of court.”

4. Local Rules 83.51.16(b)(3) and (b)(4) provide that a lawyer may withdraw from representation if the client “consents to termination of the lawyer’s employment after disclosure” or if there exists “other good cause for withdrawal.”

5. Here, Movants have consulted with Plaintiffs concerning this Motion, and Plaintiffs have consented to termination of Movants’ representation of Plaintiffs through Mr. Murphy. Moreover, other good cause exists to grant this Motion because Mr. Murphy will continue to represent Plaintiffs and protect their interests in connection with this matter. Accordingly, Movants’ withdrawal can be accomplished without material adverse effect on Plaintiffs’ interests. (Local Rule 83.51.16, cmt.)

WHEREFORE, Movants respectfully request that this Court enter an order granting: (1) Movants leave to withdraw as counsel of record for Plaintiffs; and (2) such other and further relief as the Court deems appropriate.

Respectfully submitted,

P. ANDREW FLEMING, JOHN F.
SHONKWILER, RICHARD G. DOUGLASS,
JOHN HAARLOW JR. and CHRISTOPHER G.
DEAN

By: /s/ P. Andrew Fleming
One of Their Attorneys

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CERTIFICATE OF SERVICE

P. Andrew Fleming, an attorney, certifies that he caused copies of the foregoing Motion for Leave to Withdraw as Counsel for Plaintiffs to be served by electronically filing the document with the Clerk of Court using the ECF system this 31st day of January, 2011.

/s/ P. Andrew Fleming