

UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

ERNEST FLAGG, as Next Friend of
JONATHAN BOND, a minor,

Plaintiff,

v.

Case No.: 05-CV-74253
Hon. Gerald E. Rosen
Magistrate Judge R. Steven Whalen

CITY OF DETROIT, a municipal corporation;
DETROIT POLICE CHIEF ELLA BULLY-CUMMINGS;
DEPUTY DETROIT POLICE CHIEF CARA BEST;
JOHN DOE POLICE OFFICERS 1-20; ASST.
DEPUTY POLICE CHIEF HAROLD CURETON;
COMMANDER CRAIG SCHWARTZ; POLICE LT.
BILLY JACKSON; MAYOR KWAME M. KILPATRICK,
CHRISTINE BEATTY, jointly and severally,

Defendants.

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**MORGANROTH & MORGANROTH, PLLC'S MOTION FOR LEAVE TO
WITHDRAW PURSUANT TO L.R. 83.30(a) AS COUNSEL FOR DEFENDANTS, CITY
OF DETROIT, MAYOR KWAME M, KILPATRICK, DETROIT POLICE CHIEF ELLA
BULLY-CUMMINGS AND COMMANDER CRAIG SCHWARTZ ONLY, BUT NOT
FOR CHRISTINE BEATTY**

Morganroth & Morganroth, PLLC (the "Morganroth Firm") hereby requests that this Honorable Court enter an Order, pursuant to L.R. 83.30(a), granting the Morganroth Firm leave to withdraw its appearance as counsel for Defendants, City of Detroit, Mayor Kwame M, Kilpatrick, Detroit Police Chief Ella Bully-Cummings and Commander Craig Schwartz only, but not for Christine Beatty, in the above action, based upon the following:

1. The Morganroth Firm appeared in this matter on behalf of Defendants, City of Detroit, Mayor Kwame M, Kilpatrick, Detroit Police Chief Ella Bully-Cummings, Commander Craig Schwartz and Christine Beatty, on January 11, 2008.

2. The City of Detroit's Law Department, through attorney John A. Schapka, has continued to serve as co-counsel for Defendants, City of Detroit, Mayor Kwame M, Kilpatrick, Detroit Police Chief Ella Bully-Cummings, Commander Craig Schwartz and Christine Beatty. In addition, Krystal Crittendon of the City of Detroit's Law Department also has filed an appearance on behalf of the City of Detroit and Commander Craig Schwartz.

3. The Morganroth Firm and Defendants, City of Detroit, Mayor Kwame M, Kilpatrick, Detroit Police Chief Ella Bully-Cummings and Commander Craig Schwartz, have mutually agreed to the Morganroth Firm's withdrawal as co-counsel for Defendants, City of Detroit, Mayor Kwame M, Kilpatrick, Detroit Police Chief Ella Bully-Cummings and Commander Craig Schwartz, in order to avoid the continued distractions and sideshows unrelated to the merits of their case thereby leaving the continued representation of such parties to the City of Detroit's Law Department.

4. The Morganroth Firm is not withdrawing from its representation of Christine Beatty in this case.

WHEREFORE, the Morganroth Firm respectfully requests that this Honorable Court enter an Order providing that the Morganroth Firm may withdraw as counsel for Defendants, City of

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Detroit, Mayor Kwame M, Kilpatrick, Detroit Police Chief Ella Bully-Cummings and Commander Craig Schwartz only, but not for Christine Beatty, and the City of Detroit's Law Department will continue to appear for such parties.

Respectfully submitted,

MORGANROTH & MORGANROTH, PLLC

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Dated: April 1, 2008

CERTIFICATE OF SERVICE

I hereby certify that on April 1, 2008, I electronically filed the foregoing paper with the Clerk of the Court using the ECF system which will send notification of such filing to the following:

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Dated: April 1, 2008

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