

Andrew P. Napolitano (APN-3272)
Dreier LLP
499 Park Avenue
New York, NY 10022
(212) 328-6100

Attorneys for Plaintiff
Axact (Pvt.), Ltd.

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

AXACT (PVT.), LTD.,	:	
	:	
Plaintiff,	:	Civil Action No.
	:	3:07-cv-05491 (FLW)(TJB)
v.	:	
	:	
	:	Hon. Tonianne J. Bongiovanni
STUDENT NETWORK RESOURCES, INC.,	:	United States Magistrate Judge
STUDENT NETWORK RESOURCES, LLC,	:	
ROSS COHEN and JOHN DERIT,	:	
	:	
Defendants.	:	
	:	

**NOTICE OF MOTION TO WITHDRAW AS ATTORNEYS OF RECORD AND TO
VOLUNTARILY DISMISS THE COMPLAINT OF AXACT (PVT.), LTD. PURSUANT
TO FED. R. CIV. P. 41**

PLEASE TAKE NOTICE that the law firm of Dreier LLP, counsel for plaintiff Axact (Pvt.), Ltd. ("Axact"), upon filing of the Declaration of Ira S. Sacks, dated March 17, 2008, will move this Court before the Honorable Tonianne J. Bongiovanni, United States Magistrate Judge, Clarkson S. Fisher Building and United States Courthouse, 402 East State Street, Room 2020, Trenton, NJ 08608, at such time as this Court directs, for an Order (i) granting Dreier LLP leave to withdraw as counsel of record for Axact pursuant to Local Civ. R. 102.1; and (ii) granting the motion of Dreier LLP to voluntarily dismiss without prejudice the complaint of Axact pursuant

to Federal Rule of Civil Procedure 41, or, in the alternative, permitting Axact thirty (30) days to obtain replacement counsel in this matter.

Dated: March 18, 2008
New York, NY

DREIER LLP

By: /s/ Andrew P. Napolitano
Andrew P. Napolitano
499 Park Avenue
New York, NY 10022
(212) 328-6100

Attorneys for Plaintiff Axact (Pvt.), Ltd.