

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLORADO

Civil Action No. 19-cv-00901-WJM-NRN

MICHAELLA LYNN SURAT,

Plaintiff,

v.

RANDALL KLAMSER in his individual capacity, and
CITY OF FORT COLLINS, a municipality,

Defendants.

MOTION TO WITHDRAW

Gillian Dale, counsel for Defendants Randall Klamser and City of Fort Collins (“Defendants”), in the above-captioned matter, hereby moves the Court for an Order allowing her to withdraw as counsel of record:

1. Certificate Pursuant to D.C.COLO.LCivR.7.1: Because of this motion is brought pursuant to D.C.COLO.LAtty5(b), conferral is not required. *See* D.C.COLO.L.CivR7(b)(4).
2. Ms. Dale will no longer be employed by Hall & Evans, L.L.C. effective October 8, 2020.
3. Mark S. Ratner, Esq., and Brenden Desmond, Esq., of Hall & Evans, L.L.C., and John R. Duval, Esq., Deputy City Attorney will continue to represent Defendants.
4. Defendants have received notification of the proposed withdrawal.

5. Because of the continuous representation, Ms. Dale did not notify Defendants that they are responsible for complying with all court orders and time limitations, nor that they are required to obtain legal counsel, as would otherwise be required by D.C.Colo.LAttyR5(b).

WHEREFORE, undersigned counsel respectfully requests that the Court grant this Motion and permit her to withdraw as counsel for the Defendants Randall Klamser and City of Fort Collins.

Respectfully submitted this 6th day of October, 2020.

s/Gillian Dale

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ATTORNEYS FOR DEFENDANTS

CERTIFICATE OF SERVICE (CM/ECF)

I HEREBY CERTIFY that on 6th day of October, 2020, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will send notification of such filing to the following e-mail addresses:

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s/ Nicole Marion, Legal Assistant to _____
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