

IN THE COURT OF COMMON PLEAS OF MONTGOMERY COUNTY, PENNSYLVANIA

CRIMINAL DIVISION

2016 OCT 31 PM 1:10

COMMONWEALTH OF PENNSYLVANIA

v.

KATHLEEN GRANAHAN KANE

NO. CP-46-CR-0006239-2015
CP-46-CR-0008423-2015

MOTION TO WITHDRAW AS COUNSEL

I, Ross M. Kramer, of the law firm of Winston & Strawn LLP, hereby move to withdraw as counsel to Kathleen Granahan Kane in the above captioned matters and aver as follows:

1. I entered my appearance as co-counsel to Kathleen Granahan Kane in the above matters and was admitted to practice Pro Hac Vice on or about October 29, 2015.

2. The terms of my retention agreement with Ms. Kane do not include appellate proceedings.

3. I served as co-counsel to Ms. Kane throughout her trial and sentencing.

4. I have completed all duties and obligations owed to Ms. Kane as her counsel under the terms of our retention agreement.

5. Pursuant to Pennsylvania Rule of Criminal Procedure 120, leave of Court is required for counsel to withdraw his appearance.

6. Ms. Kane's rights are protected, as she has retained other counsel for any and all future proceedings.

7. My co-counsel Gerald Shargel of Winston & Strawn LLP consulted with Ms. Kane on this issue, and she confirmed that she consents to my withdrawal as counsel. She additionally confirmed that she retained other counsel to represent her in any and all appellate proceedings.

WHEREFORE, I respectfully request that this Honorable Court grant my motion to withdraw as counsel and execute the attached Order.

Respectfully submitted,



ROSS M. KRAMER, Esq.
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Dated: 10/28/16

CERTIFICATE OF SERVICE

A true and correct copy of the foregoing Motion to Withdraw as Counsel has been served on the following individuals in the manner described below:

VIA ELECTRONIC MAIL AND FIRST CLASS MAIL

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Date: 10/28/2016



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ORDER

AND NOW, this ____ day of October, 2016, upon consideration of the Motion of Ross M. Kramer, Esquire to withdraw as counsel for the Defendant in the above-captioned matters, said Motion is GRANTED. The Clerk of Courts of Montgomery County is to withdraw Mr. Kramer's appearance in the above matters, and Mr. Kramer is relieved of his duties as counsel to the Defendant.

BY THE COURT:

The Honorable Wendy Demchick-Alloy