

IN THE COURT OF COMMON PLEAS MONTGOMERY COUNTY, PENNSYLVANIA

CRIMINAL DIVISION

COMMONWEALTH OF PENNSYLVANIA

v.

KATHLEEN KANE

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

MOTION TO WITHDRAW AS COUNSEL

I, Amil M. Minora, of the law firm of Minora, Minora, Colbassani, Krowiak, Mattioli & Munley, hereby move to withdraw as counsel to Kathleen Granahan Kane in the above captioned matters and avers as follows:

1. I entered my appearance to Kathleen Granahan Kane in the above matters on or about August 2015.
2. The terms of my retention agreement with Ms. Kane do not include appellate proceeding.
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.

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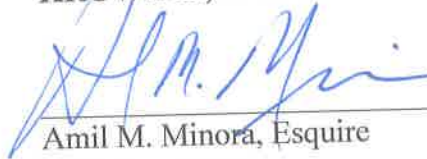
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6. Ms. Kane's rights are protected, as she has retained other counsel for any and all future proceedings.
7. I consulted with Ms. Kane on this issue, and she confirmed that she consents to my withdrawal as counsel. She additionally confirmed that she 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,

**MINORA, MINORA, COLBASSANI,  
KROWIAK, MATTIOLI & MUNLEY**



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Date: \_\_\_\_\_

11/9/16

**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**

District Attorney Kevin R. Steele  
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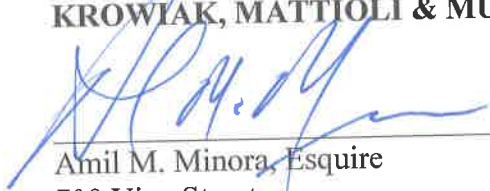
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Date: 11/9/16

**MINORA, MINORA, COLBASSANI,  
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	:	
KATHLEEN KANE	:	

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ORDER

AND NOW, this \_\_\_\_\_ day of November, 2016, upon consideration of the Motion of Amil M. Minora, 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. Minora's appearance in the above matters, and Mr. Minora is relieved of his duties as counsel to the Defendant.

BY THE COURT:

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The Honorable Wendy Demchick-Alloy