

IN THE CIRCUIT COURT OF CLINTON COUNTY, MISSOURI

F I L E D  
NOV 22 2010  
MOLLY LIVINGSTON  
Clark of Clinton Co. Circuit Court

BEVERLY LONG, et al., )  
)  
Plaintiffs, )  
)  
v. )  
)  
PRIME TANNING CORP., et al. )  
)  
Defendants. )

Case No. 09CN-CV00422

**MOTION TO WITHDRAW AS COUNSEL OF RECORD FOR DEFENDANTS PRIME TANNING CORP., PRIME TANNING CO., INC. AND WISMO CHEMICAL CORP.**

COMES NOW the law firm of Drummond Woodsum and MacMahon and moves the Court for a leave to withdraw as counsel of record for Defendants Prime Tanning Corp., Prime Tanning Co., Inc., and Wismo Chemical Corp. in the above-styled matter. In support of this Motion, the undersigned states as follows:

1. Drummond Woodsum & MacMahon was retained to represent Defendants Prime Tanning Corp., and Prime Tanning Co., Inc., in multiple cases making similar claims filed throughout numerous Missouri Counties and the United States District Court of the Western District of Missouri.
2. The last known address for Prime Tanning Corp. is 9 Main Street, Hartland, Maine 04943.
3. The last known address for Prime Tanning Co., Inc. is 9 Main Street, Hartland, Maine 04943.
4. The last known address for Wismo Chemical Corp. which is wholly owned by Prime Tanning Co., Inc. is 546 S. Water Street, Milwaukee, Wisconsin 53204.
5. Drummond Woodsum & MacMahon was admitted in this case Pro Hac Vice with

Polisinelli Shughart PC acting as local counsel. Polisinelli Shughart PC has recently moved for and obtained leave to withdraw.

6. Prime Tanning Corp., & Prime Tanning Co., Inc., are seeking protection under the U.S. Bankruptcy Code. Drummond Woodsum and MacMahon is no longer authorized to represent these entities.

7. Drummond Woodsum & MacMahon seeks to withdraw as counsel for the above-named Defendants because it is no longer authorized to act as counsel.

8. Drummond Woodsum & MacMahon also seeks to withdraw as counsel because it has no member of the Missouri Bar having an office within the State of Missouri as associate counsel as required under Supreme Court Rule 9.03(a).

WHEREFORE, the law firm of Drummond Woodsum & MacMahon respectfully requests that this Honorable Court permit it leave to withdraw as attorneys of record in the above-styled case.

Dated: November 18, 2010

Respectfully submitted,

**DRUMMOND WOODSUM & MACMAHON**

  
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CHEMICAL CORP.**

**CERTIFICATE OF SERVICE**

I certify that on this 18<sup>th</sup> day of November, 2010, copies of the foregoing were mailed via first class U.S. mail postage prepaid, to:

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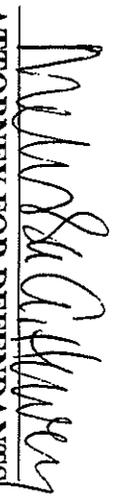
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