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Patrick Pedano, Esq.

From: Patrick Pedano, Esq.
Sent: Wednesday, August 16, 2023 10:24 AM
To: Sara Deckelman; [redacted]
Cc: Rosemary Mroczkowski; Meredith Sinak
Subject: Deckelman v. Deckelman; Husband's Motion for Contempt and TRO
Attachments: Husband's Motion for Contempt and TRO.pdf; Notice of Hearing- Contempt and TRO.pdf; Motion to Withdraw.pdf; Notice of Hearing and Motion to Shorten Time-Motion to Withdraw.pdf

Sara,

First and foremost, I want to reach out to you to provide you with an important and time sensitive update regarding your case. Yesterday, we received notice that Thomas and his attorneys have filed a Motion for Contempt and Motion for TRO against you. I have attached a copy of the Motion along with all exhibits which have been filed with the court for your review. [redacted] This Motion has been set for expedited hearing this coming Friday, August 23, 2023 at 9:45 a.m. The nature of the Motion requires that you be present in person at court on this court date. Therefore, please make arrangements to be present in court on this date and time.

Regrettably, we will not be able to represent you at the hearing of this Motion. [redacted] As a result of the foregoing, we regrettably have no choice but to file a Motion to Withdraw with the Court seeking to be officially removed as your counsel in the case. I have attached a copy of the Motion here, along with a Notice of Haring requesting that our Motion to Withdraw be heard prior to the Motion for Contempt/TRO which is also set for this same date and time. [redacted] As a result, you will need to be prepared to possibly represent your own interest on the Motion for Contempt/TRO which is scheduled to be heard immediately after my Motion to Withdraw, and you may want to consider obtaining alternate counsel to represent your interests at this hearing.

It saddens me to have to file this Motion, and I truly wish you the best of luck and hope that you are successful in defending these Motions moving forward.

-Patrick

Patrick W. Pedano, Esq.
Family Law Partners
699A Trade Center Blvd.
Chesterfield, Missouri 63005
Office: 636-778-3400