Electronically Filed - ST LOUIS COUNTY - August 16, 2023 - 11:07 AM

IN THE CIRCUIT COURT OF THE COUNTY OF ST. LOUIS
STATE OF MISSOURI

In re the Matter of:	)	
	)	
THOMAS DECKELMAN,	)	
	)	
Petitioners,	)	
	)	Cause No. 22SL-DR02215
v.	)	
	)	Division No. 32
SARA DECKELMAN,	)	
	)	
Respondent.	)	

MOTION TO SHORTEN TIME AND NOTICE OF HEARING

COMES NOW, counsel for Respondent, Patrick W. Pedano, Esq. and the , by and through her undersigned counsel, and moves this court shorten time for the hearing of Counsel's Motion to Withdraw and that the court set said Motion for hearing on August 18, 2023 at 9:45 a.m. In support thereof, Respondent's Counsel states as follows:

1. That Petitioner has filed a Motion for Contempt and Motion for Temporary Restraining Order with this honorable court, which was set for expedited hearing on Friday, August 18, 2023 at 9:45 a.m.
2. That Respondent has not engaged or retained her counsel to represent her in any post-dissolution actions or motions.
3. That as a result, Respondent's Counsel cannot represent her at the scheduled Motion for Contempt and TRO hearing.
4. That due to the expedited setting of the underlying Motions, provision of notice pursuant to the Missouri Rules of Civil Procedure was not possible.
5. That Respondent's counsel's Motion for Withdrawal will need to be determine prior to hearing on Petitioner's Motion for Contempt and TRO.

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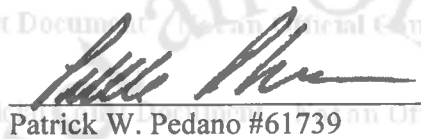
6. That the interests of judicial economy are best served by hearing of said Motion before hearing upon the Motion for Contempt and TRO.

7. That the shorting of time upon Respondent's counsel's Motion to Withdraw would not prejudice any party.

WHEREFORE, Patrick W. Pedano, Esq. and the law firm of Family Law Partners, requests this Court shorten time upon hearing of Respondent's Counsel's Motion to Withdraw; that said Motion be heard Friday, August 18, 2023 at 9:45 a.m. prior to hearing upon any other Motions.; and for such further relief as this court deems just and proper.

Respectfully submitted,

FAMILY LAW PARTNERS



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CERTIFICATE OF SERVICE

The undersigned does hereby certify that a true and accurate copy of the foregoing was sent this 16th day of August, 2023 to the following parties and/or counsel of record:

Laura Stobie
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____ via United States first class mail, postage prepaid.

____ via facsimile transmission.

____ via hand delivery.

X via email transmission/Missouri E-Filing System

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