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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 WITHDRAW AS COUNSEL FOR RESPONDENT

COMES NOW, Patrick W. Pedano, Esq. and the Family Law Partners Law Firm and hereby requests leave to withdraw as counsel for Respondent, Sara Deckelman. In support thereof, Counsel states as follows:

1. A Judgment of Dissolution was entered by this honorable court on April 26, 2023, and that Motion for Contempt and Motion for TRO was filed by Husband on or about August 14, 2023 alleging violation of the parties' Judgment of Dissolution.
2. That Respondent's Mailing address is [redacted].
3. That leave to withdraw is request for the reason that Respondent's Attorney-Client Fee Agreement with counsel is limited to representation of Respondent related to her divorce, and not any post-judgment actions or motions.
4. Leave to withdraw is further requested for the reason that there exists irreconcilable differences between Respondent and her counsel of record.

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5. A copy of the correspondence terminating Respondent's counsel's legal services is attached hereto and incorporated herein which advises Respondent of all upcoming court dates and important deadlines in this matter.
6. Notice of this Motion has been given to all parties of record and the Respondent via. A copy of said correspondence is attached hereto and incorporated herein.
7. Respondent has been advised of all upcoming court dates and deadlines.
8. Neither Respondent, nor Petitioner, nor this court will be prejudiced by granting Respondent's Counsel's leave with withdraw as counsel for Respondent herein.

WHEREFORE, Patrick W. Pedano and the Family Law Partner's Law Firm move to withdraw as counsel of record for Respondent Sara Deckelman, in the above captioned matter; Request that this Honorable Court enter an order granting Counsel leave to withdraw as counsel for the same; and for such further relief as this court deems just and proper.

Respectfully submitted,

FAMILY LAW PARTNERS

Patrick W. Pedano #61739
Attorneys for Respondent
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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
Attorney at Law
825 Maryville Centre Drive
Suite 300
Town & Country, MO 63017
Telephone: 314-392-5200
Fax: 314-392-5221
lstobie@mlklaw.com

Sara Vachon Deckelman
Respondent

[redacted]

____ 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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