

Hais, Hais & Goldberger, P.C.

Attorneys at Law

Partners:

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January 22, 2021

ANGELA FREINER
8547 PILOT AVE., ST. LOUIS, MISSOURI 63123
<angelamfreiner@gmail.com>

Re: Freiner v. Judy, 14SL-DR02617-01

Dear Ms. Freiner,

As you know, you have instructed us to remove ourselves from your case and as a direct result we will be filing the attached Motion to Withdraw. We will be setting our Motion for hearing and will notify you of the date and time and the video conference meeting information will be provided to you once issued.

If our Motion to Withdraw is granted the Court will send all future notices to you at the above address unless you notify them of a different address.

Your case is set for hearing on January 29, 2021, we have filed the attached Notice of Hearing for our Motion to be heard on the same day. Please be aware that you will need to be present at the hearing on January 29, 2021 to represent yourself or with alternative counsel should the Court grant our request. Please be aware that your case will be set for another hearing and will need to be present, in the St. Louis County Circuit Court, and that you must appear with alternate counsel or prepared to represent yourself. We wish you the best of luck in the future.

If you should have any questions, please do not hesitate to contact our office. You may seek other legal counsel to represent your interest in this matter.

Sincerely,
/s/ Daniel Zdrodowski
Daniel Zdrodowski
and Susan Hais

DZ/kb
Enclosures

**N THE FAMILY COURT OF THE COUNTY OF ST. LOUIS
STATE OF MISSOURI**

In re: The Matter of:)	
ANGELA FREINER,)	
)	
Petitioner,)	
)	Cause No. 14SL-DR02617-01
vs.)	
)	
JAMES S. JUDY,)	Division: 31
)	
)	
Respondent.)	

MOTION TO WITHDRAW AS COUNSEL FOR PETITIONER

COMES NOW, Hais, Hais & Goldberger, PC and for their Motion to Withdraw as Counsel for Petitioner, ANGELA FREINER, respectfully states as follows:

1. There are currently pending child custody issue before this Court, under the above cause numbers.
2. Petitioner’s last known mailing address is 8547 PILOT AVE., ST. LOUIS, MISSOURI 63123.
3. Leave to withdraw is requested per Petitioner’s instruction.
4. Granting said Motion to Withdraw would not be inequitable.
5. Petitioner has been informed that her case was set for Motion hearing on January 29, 2021 and is aware that she will need to be present, in the St. Louis County Circuit Court and that she must appear with alternate counsel or prepared to represent herself for this hearing and any set in the future.
6. Petitioner has been informed that this Motion will be heard via video conference on and that we will notify her of the date and time once set. Counsel has filed a Notice of Hearing concurrently with this filing to have their Motion heard at the conference currently set for January 29, 2021.

7. A copy of a letter to Petitioner is attached, notifying Petitioner of this request, of her pending conference date, and the hearing this Motion will be heard.

WHEREFORE, Movant respectfully requests the Court grant their motion to withdraw as counsel of record for Petitioner in the above-referenced matter and for such other further orders this Court deems just and proper.

SO ORDERED: _____ this ___ day of _____, 2021.
Judge

H AIS, H AIS & G O L D B E R G E R, P. C.

/s/ Daniel Zdrodowski

By: _____

Susan M. Hais, #25165
Daniel Zdrodowski, #67020
222 S. Central Avenue, Suite 600
Clayton, Missouri 63105
(314) 862-1300
(314) 862-1366 (Fax)
Email: susan@hhg-law.com
Email: daniel@hhg-law.com

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true copy of the foregoing was served upon Petitioner by: U.S. mail, postage prepaid; via e-mail; via facsimile; via electronic filing pursuant to Rule 103.08, on this 22nd day of January 2021 as listed below, and certifies that all counsel of record for this matter were served via Missouri Electronic Filing on the same date:

ANGELA FREINER
8547 PILOT AVE., ST. LOUIS, MISSOURI 63123
<angelamfreiner@gmail.com>

/s/ Kelsie Barnes _____

**N THE FAMILY COURT OF THE COUNTY OF ST. LOUIS
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)	
Petitioner,)	
)	Cause No. 14SL-DR02617-01
vs.)	
)	
JAMES S. JUDY,)	Division: 31
)	
)	
Respondent.)	

NOTICE OF HEARING

COMES NOW, Hais, Hais & Goldberger, PC and shall call for hearing their Motion to Withdraw as Counsel for Petitioner, on January 29, 2021 at 10:00 AM, or as soon thereafter as counsel may be heard, in the Circuit Court of St. Louis County.

HAIS, HAIS & GOLDBERGER, P.C.

/s/ Daniel Zdrodowski

By: _____

Susan M. Hais, #25165
Daniel Zdrodowski, #67020
222 S. Central Avenue, Suite 600
Clayton, Missouri 63105
(314) 862-1300
(314) 862-1366 (Fax)
Email: susan@hgg-law.com
Email: daniel@hgg-law.com

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ANGELA FREINER
8547 PILOT AVE., ST. LOUIS, MISSOURI 63123
<angelamfreiner@gmail.com>

/s/ Kelsie Barnes _____