



**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS**

IN RE: HAIR RELAXER MARKETING, SALES PRACTICES, AND PRODUCTS LIABILITY LITIGATION	MDL No. 3060 Master Docket Case No. 1:23-cv-00818 Honorable Mary M. Rowland
PLAINTIFF, v.  DEFENDANT(S)	Civil Action No. 1:24-cv-00001  MDL-C Plaintiff ID No. 000001

**MOTION TO WITHDRAW AS COUNSEL**

Plaintiff’s Counsel [insert name], of the law firm [insert firm name], hereby moves to withdraw as Counsel of Record for Plaintiff [insert name]. Plaintiff will remain in this litigation as a *pro se* plaintiff if this Motion is granted.

Pursuant to CMO No. 13, Counsel is seeking to withdraw their representation due to:

[Choose Option A, B or C]:

[A]: Counsel being unable to contact Plaintiff.

[B]: Plaintiff indicating that she no longer wishes to be represented by Counsel.

[C]: A fundamental disagreement between Counsel and Plaintiff such that Counsel cannot appropriately represent Plaintiff.

The circumstances of the good cause sought for Counsel’s motion to withdraw are as follows: \_\_\_\_\_.

Counsel has complied with all relevant Local Rules, Federal Rules, and ethical obligations. Counsel provided Plaintiff with a copy of this Motion and attachments, all active scheduling orders, a copy of all Case Management Orders, an update on the status of the

Plaintiff's case, information on how to access the Plaintiff's portal on MDL Centrality, and a copy of all discovery obtained and produced by the Plaintiff, current as of the date of the filing of this Motion.

Pursuant to CMO 13, Counsel has completed the required Notification of Plaintiff Contact Information Form and has appropriately filed the Form under seal and submitted required Plaintiff information through MDL Centrality.

Thus, Counsel hereby requests leave of Court to withdraw as counsel.

Dated: [date]

/s/ Attorney Name  
Attorney Signature block

*Attorney for Plaintiff*

### **CERTIFICATE OF SERVICE**

I hereby certify that on [Date], I caused a copy of the foregoing to be filed through the Court's CM/ECF system, which will serve all counsel of record including via Case Retriever on MDL Centrality, and provided a copy of same to Plaintiff via [input service type].

/s/ Attorney Name  
Attorney Name

### **CERTIFICATE OF CONFERENCE**

I hereby certify that on [Date], I provided a copy of this Motion and attachments to Defense and Plaintiffs' Leadership *Pro Se* Liaison Counsel and Defense *Pro Se* Liaison Counsel does not oppose this Motion.

/s/ Attorney Name  
Attorney Name