

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

MICHAEL MOLINARO,)	Civil Action No. 2:22-cv-00882
)	
Plaintiff,)	HONORABLE WILLIAM S. STICKMAN
)	
v.)	
)	
LEET TOWNSHIP,)	
)	
Defendant.)	Electronically Filed.

MOTION TO WITHDRAW

COME NOW, counsel for the Plaintiff, LAW OFFICES OF JOEL SANSONE, JOEL S. SANSONE, ESQUIRE, MASSIMO A. TERZIGNI, ESQUIRE, and ELIZABETH A. TUTTLE, ESQUIRE, and hereby move this Honorable Court to permit undersigned counsel and his law firm to withdraw their appearances in the above-captioned case for the following reasons:

1. This action was filed by the Plaintiff on June 14, 2022.
2. Since that time, Plaintiff and counsel have developed irreconcilable differences.
3. Because of these irreconcilable differences, undersigned counsel and his law firm cannot properly discharge their duties.
4. Undersigned counsel respectfully request that he and his law firm be permitted to withdraw from this case, and that Plaintiff be permitted a period of 60 days within which to obtain substitute counsel.

WHEREFORE, for all of the above reasons, undersigned counsel respectfully request that this Honorable Court enter an Order to withdraw their appearances and to permit a period of 60 days within which Plaintiff may obtain substitute counsel.

Respectfully submitted,

LAW OFFICES OF JOEL SANSONE

s/Joel S. Sansone

Joel S. Sansone, Esquire

PA ID No. 41008

Massimo A. Terzigni, Esquire

PA ID No. 317165

Elizabeth A. Tuttle, Esquire

PA ID No. 322888

Two Gateway Center, Suite 1290

603 Stanwix Street

Pittsburgh, Pennsylvania 15222

412.281.9194

Dated: April 19, 2023

CERTIFICATE OF SERVICE

This hereby certifies that on the 19th day of April, 2023, a true and correct copy of the foregoing Motion to Withdraw was served upon the following as follows:

By ECF Transmission

Estelle K. McGrath, Esquire
ekmcgrath@mdwecg.com
Marshall, Dennehey, Warner, Coleman
& Goggin
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Mr. Michael Molinaro
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s/Joel Sansone

Joel S. Sansone, Esquire
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Defendant.)	Electronically Filed.

ORDER

AND NOW, this ___ day of _____, 2023, upon consideration of the Plaintiff's current counsels' Motion to Withdraw, said motion is GRANTED. It is ORDERED that the representation of Law Offices of Joel Sansone, Joel S. Sansone, Massimo A. Terzigni and Elizabeth A. Tuttle is withdrawn. It is further ORDERED that Plaintiff, Michael Molinaro, has until the ___ day of _____, 2023, to obtain new counsel.

By the Court,

_____ J.