

Colorado Court of Appeals;
Colorado State Judicial Building
2 E. 14th Ave.
Denver, CO 80203
(303) 837-7200

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FILE
MAY 2 / 2005

DISTRICT COURT, DOUGLAS COUNTY,
COLORADO
Court Address: 4000 Justice Way, Castlerock, CO 80104
Phone Number: (303) 663-7200
Case No. 97 DR 704

Clerk, Court of Appeals

In Re: The Custody of:
TWM,
Impartial,

▲ COURT USE ONLY ▲

Upon the Petition of:

CAROLYN M. TAYLOR,
Petitioner/Appellee

Case No. 04 CA 2318

and Concerning
GORDON STADNYCK,
Respondent/Appellat.

Head Counsel for Respondent:
Robert L. Goodbinder, #8301
699 W.29th Ave., Suite 3318
Denver, CO 80202
Phone Number: (303) 298-7276

Robert L. Goodbinder's Motion to Withdraw as a Counsel

COMES NOW, Robert L. Goodbinder, Reg. No.8301, and respectfully request s that this Court allow him to withdraw as a counsel for Respondent, Gordon F. Stadnyck. As grounds therefore, counsel states as follows:

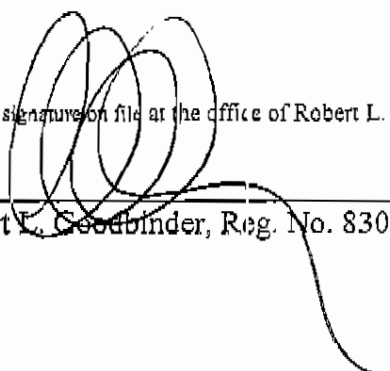
1. Respondent has stated that he is unable to continue to afford private representation.
2. Counsel was retained by Respondent to represent his interests in this matter, and counsel is entitled to reimbursement for fees and costs incurred with his representation of Respondent.

3. Respondent currently has an outstanding balance due which remains unpaid for several months.
4. Counsel has had multiple communications with Respondent regarding these matters and Respondent has notified him of his inability to fulfil his financial obligations to the counsel.
5. Counsel can no longer continue to carry Respondent without financial remuneration.
6. I declare under penalty of perjury under the laws of the State of Colorado that the foregoing is true and correct.

WHEREFORE, for all of the foregoing reasons undersigned counsel respectfully request that this Court allow withdrawal as counsel of record in this case

Dated the 27th day of May 2005.

Original signature on file at the office of Robert L. Goodbinder



Robert L. Goodbinder, Reg. No. 8301

CERTIFICATE OF SERVICE

I hereby certify that on this 27th May 2005 a true and correct copy of the foregoing ***Robert L. Goodbiner's Motion to Withdraw as Counsel*** was filed via Lexis Nexis and served upon the following, within twenty-four (24) hours, and addressed as follows:

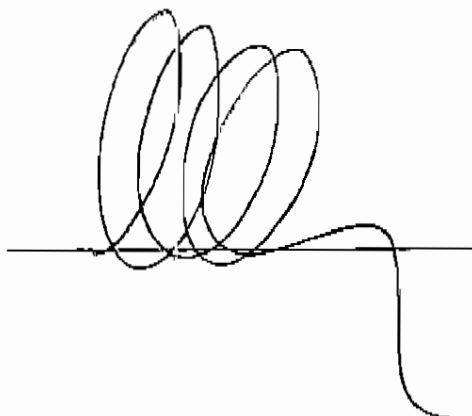
Madeline Wilson
501 S. Cherry Street, Ste610
Denver, CO 80246

John W. McKendree, #1209
Law Offices of John W. McKendree
1244 Grant Street
Denver, CO 80203

Courtesy Copy to:
Judge Kenneth F. Barnhill
10365 Read Mountain East
Littleton, CO 80127

VIA US Mail to the following:

Gordon Stadnyck
PO Box 100157
Denver, CO 80202

A handwritten signature in black ink, consisting of several overlapping loops and a long vertical tail extending downwards from the right side.

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Case No. 04 CA 2318

Div.:

NOTIFICATION to Gordon F. Stadnyck Regarding Robert L. Goodbinder's Motion to Withdraw as a Counsel

TO THE RESPONDENT: Gordon F. Stadnyck

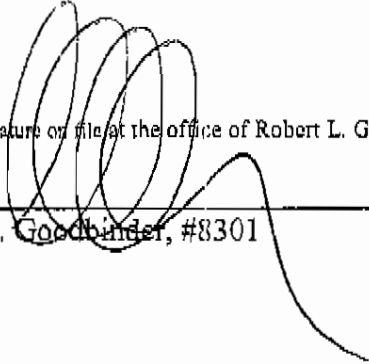
Please take notice that Robert L. Goodbinder is moving to withdraw as your counsel of record in the within matter. The filing of the Motion to withdraw allows you the following rights:

1. You have the right to object to the Motion to Withdraw within fifteen days. If you do not file an objection to the Motion, Robert L. Goodbinder will be permitted to withdraw as your counsel of record.

2. You have the burden of keeping the court and all parties named herein informed of all addresses where papers may be served upon you. You're last known address is: 9418 Ingalls St., Westminster, CO 80031-2824
3. You have the burden of preparing for any hearing or trial in the within case. Currently there are not hearings and/or deadlines set in this matter.
4. You have the burden of complying with any and all court orders, not doing so may result in a court order or contempt against you.
5. You have the right to seek and retain new counsel to represent you in the within matter.

DATED this 27th day of May, 2005.

Original signature on file at the office of Robert L. Goodbinder



Robert L. Goodbinder, #8301

CERTIFICATE OF SERVICE

I hereby certify that on this 27th May 2005 a true and correct copy of the foregoing *Notification to Gordon F. Stadnyck of Robert L. Goodbiner's Motion to Withdraw as Counsel* was filed via Lexis Nexis and served upon the following, within twenty-four (24) hours, and addressed as follows:


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PROPOSED ORDER Re: Robert L. Goodbinder's Motion to Withdraw as a Counsel

THIS MATTER, having come before the Court on Robert L. Goodbinder's Motion to Withdraw as a Counsel of Record, and being fully advised on the premises, hereby orders:

Attorney Goodbinder's motion is GRANTED. Robert L. Goodbinder is withdrawn as counsel of record effective as of the date of this Order.

DONE this _____ day of _____, 2005.

By the Court:

Judge