

El Paso County, Colorado X District ___ County Court Address: 20 East Vermijo Ave. Colorado Springs, CO 80903 Phone Number: (719) 448-7600	
Petitioner: DEBORAH ANN THORUP, vs. Respondent: DALE K. THORUP,	
Attorney or Party without Attorney (name and Address): Herman A. Lohse, III 405 S. Cascade Ave. #206, Colorado Springs, CO 80903 Phone Number: 635-4840 Email: FAX Number: 635-8479 Atty.Reg. #: 9067	Court Use Only Case Number: 01DR2408 Division 6 Courtroom
MOTION TO WITHDRAW AS ATTORNEY OF RECORD	

COMES NOW, Herman A. Lohse, III, and moves this Court to allow him to withdraw as attorney for Deborah Ann Thorup, Petitioner, and as grounds therefore states as follows:

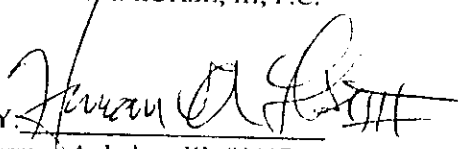
- A. Attorney wishes to withdraw as attorney of record for the Petitioner in this matter.
- B. In compliance with C.R.C.P. Rule 121, attorney Herman A. Lohse, III, hereby gives CERTIFICATION OF WRITTEN NOTIFICATION to Deborah Ann Thorup, Petitioner, of the following:
 - 1. That the attorney Herman A. Lohse, III, wishes to withdraw as counsel for Petitioner.
 - 2. That the Court retains jurisdiction of this matter.
 - 3. That the Petitioner, has the burden of keeping the Court informed where notices, pleadings, or other papers may be served.
 - 4. That the Petitioner has the obligation to prepare for trial/hearing or hire other counsel to prepare for trial/hearings when and if another trial/hearing date should be set.
 - 5. That if the Petitioner fails or refuses to meet these burdens, the Petitioner may suffer possible default.
- C. In compliance with C.R.C.P. Rule 121, has been met as evidenced by attachments hereto: Written Notification Certificate, and Attorney/Client correspondence.

WHEREFORE, Attorney Herman A. Lohse, III, moves this Court to Order Withdrawal as attorney of record after fifteen days of this motion.

Attachment B

Respectfully submitted this 2nd day of January 2002.

HERMAN A. LOHSE, III, P.C.

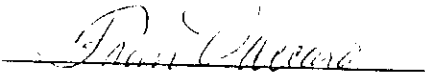
BY: 
Herman A. Lohse, III, #9067
Attorney for Petitioner
405 S. Cascade Avenue, #206
Colorado Springs, CO 80903
(719) 635-4840

CERTIFICATE OF MAIL/HAND-DELIVERY

I hereby certify that a true and correct copy of the Motion to Withdraw as Counsel was mailed and/or hand-delivered, postage paid on the 2nd day of January 2002 to:

Deborah Ann Thorup
3655 S. Verbena St. J-204
Denver, CO 80237

Dale Thorup
3053 Seven Arrows Court
Canon City, CO 81212



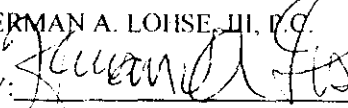
El Paso County, Colorado X District ___ County ___ Court Address: 20 East Veranijo Ave. Colorado Springs, CO 80903 Phone Number: (719) 448-7650	
Petitioner: DEBORAH ANN THORUP, vs. Respondent: DALE K. THORUP,	Court Use Only
Attorney or Party without Attorney (name and Address): Herman A. Lohse, III 405 S. Cascade Ave. #206, Colorado Springs, CO 80903 Phone Number: 635-4840 Email: FAX Number: 635-8479 Atty.Reg. #: 9067	Case Number: 01DR2408 Division 6 Courtroom
WRITTEN NOTIFICATION CERTIFICATE	

COMES NOW the undersigned attorney, Herman A. Lohse, III, P.C., in support of his Motion for Withdrawal as Counsel for Petitioner filed herein, and certifies as follows:

1. The notification requirements of C.R.C.P. Rule 121, Section 1-1, Paragraph 2, have been met, as evidenced by Attachment "B" to the Motion for Withdrawal filed herein.
2. Such notification was given to the client by Certified Mail, return receipt requested, on the date indicated on said letter represented by Attachment "A" to the Motion.
3. The client's last known address is: 3655 S. Verbena St. J-204, Denver, CO 80237
4. A copy of the Written Notification Certificate is mailed contemporaneously herewith to the client and to all other parties as evidence by the Certificate of Mailing herein below.

WHEREFORE, having fully complied by the supplying of this Written Notification Certificate, the undersigned attorney requests that the Motion for Withdrawal as Counsel for Petitioner be granted.

Respectfully submitted this 2nd day of January 2002.

HERMAN A. LOHSE, III, P.C.
 BY: 
 Herman A. Lohse, III, #9067
 Attorney for Petitioner
 405 S. Cascade Avenue, #206
 Colorado Springs, CO 80903
 (719) 635-4840

HERMAN A. LOHSE, III, P.C.
Attorney at Law
405 S. Cascade Ave., Ste. #206
Colorado Springs, CO 80903
(719) 635-4840

January 2, 2002

Deborah Thorup
3655 S. Verbena St. J-204
Denver, CO 80237

Re: Enclosures

Dear Debbie,

Pursuant to Rule 121, Section 1-1 of the Colorado Rules of Civil Procedure, you are hereby notified as follows:

1. The undersigned attorney is withdrawing from further representation of your case bearing Case No. 01DR2408, Division No. 6, in the District Court of El Paso County, Colorado.
2. That this court retains jurisdiction over that action.
3. That you have the burden of keeping the court informed where notices, pleadings or other papers may be served, upon the granting of the Order.
4. That there are no presently pending hearings and/or trial dates at this time.
5. You have the right to object within fifteen (15) days of the date of this notice to my withdrawal from representation of you in said action.

Thank you for the opportunity to have been of assistance to you and best of luck in your future endeavors.

Sincerely yours,



Herman A. Lohse, III

HAL/fv
enclosures

Attachment A