

IN THE SUPREME COURT OF OHIO

STINSON J. CREWS, <i>et. al.</i>	:	Case No.: 13 - 0283
	:	
Appellees,	:	ON APPEAL FROM:
	:	Tenth Appellate District,
	:	Case No. 12 AP 320
v.	:	
	:	
CENTURY SURETY COMPANY,	:	
	:	
Appellant.	:	

MOTION TO WITHDRAW AS COUNSEL

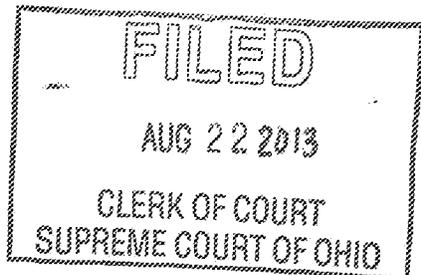
Now comes the below-signed attorneys, M. Shawn Dingus and Michael R. Guluzian, and respectfully request this Court to grant them leave to withdraw as counsel for Appellees Stinson J. Crews and Stinson Crews Trucking (collectively “Crews” or “Appellees”) in the above case. Support for this Motion is contained in the Memorandum of Law the follows.

Respectfully submitted,

Plymale & Dingus, LLC



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 Attorney for Appellees



**MEMORANDUM OF LAW**

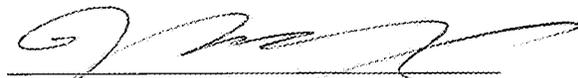
The undersigned attorneys were initially retained by the Crews in this matter in August of 2007. As part of the fee agreement entered into between the undersigned attorneys and Crews, Appellees agreed to pay the attorneys a certain fee. However, Crews has failed to comply with the terms of the fee agreement.

In the absence of the Crews's compliance with the fee agreement, the below-signed attorneys are unable to continue to represent him in this matter. Appellees have been informed of the undersigned attorneys' intention to file this motion. Crews has further been informed that he will need to be prepared to represent himself or find new counsel to represent him in the future.

Based on the above circumstances, the undersigned attorneys respectfully request this Court to grant them leave to withdraw as the Crews's attorney. Crews's current address is 3099 Winchester Pike Columbus, Ohio 43232 and his phone number is believed to be 614-239-8348.

Respectfully submitted,

Plymale & Dingus, LLC



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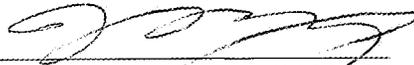
## CERTIFICATE OF SERVICE

This is to certify that a true and accurate copy of the foregoing was sent via regular U.S. mail, postage prepaid, this 22nd day of August, 2013 to the following:

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