

*O'Grady*

IN THE FRANKLIN COUNTY MUNICIPAL COURT  
CIVIL DIVISION  
FRANKLIN COUNTY, OHIO

FILED  
14 OCT 27 PM 2:42

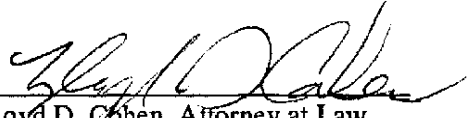
FRANKLIN COUNTY  
MUNICIPAL COURT  
LORI M. TYACK

Veronica Wagner Covatch, <i>et. al.</i>	*	Case No. 2014 CVF 02437
	*	
Plaintiffs,	*	
v.	*	Judge James P. O'Grady
	*	
Central Ohio Sheltie Rescue, Inc., <i>et. al.</i>	*	
	*	
Defendants.	*	

**MOTION TO AUTHORIZE LLOYD D. COHEN TO  
WITHDRAW AS TRIAL ATTORNEY FOR PLAINTIFFS**

Now comes Lloyd D. Cohen, Trial Attorney for Plaintiffs Veronica Wagner Covatch and Michelle Wilson who moves this Court, pursuant to Local Rule 3.02, for an Order authorizing his withdrawal as trial counsel.

Respectfully submitted,

  
 Lloyd D. Cohen, Attorney at Law  
 824 South High Street  
 Columbus, Ohio 43206 [Reg. No. 0012100]  
 Phone: 614-444-4211, Fax: 614-448-4522  
 Email: lcohen@lloydcohen.com  
*Trial Attorney for Plaintiffs*

**Memorandum**

Following the 7/28/14 commencement of this case, there have arisen between attorney and clients fundamental disagreements about evidence, witnesses, issues, and the obligations associated with being a party to litigation. These irreconcilable differences make withdrawal at

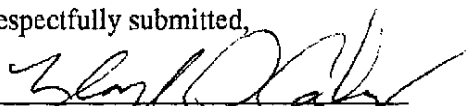
this time both permissible and appropriate. Withdrawal will not have a materially adverse effect on the interests of the clients because there is plenty of time to obtain substitute trial counsel.

Trial on this matter has not yet been set and the pretrial conference has been continued to

December 11, 2014 at 9:00 a.m. **Professional Statement: If allowed to withdraw, a copy of**

**the entry authorizing withdrawal will be mailed immediately to the last known address of the clients.**

Respectfully submitted,

  
Lloyd D. Cohen, Attorney at Law  
824 South High Street  
Columbus, Ohio 43206 [Reg. No. 0012100]  
Phone: 614-444-4211, Fax: 614-448-4522  
Email: [lcohen@lloydcohen.com](mailto:lcohen@lloydcohen.com)  
Attorney for Plaintiffs


#### Certificate of Service

I certify that on October 27, 2014, I served a true copy of the foregoing Motion to Withdraw as Counsel, by first class U.S. mail, postage prepaid upon:

defendants' attorney: John A. Bell, Attorney at Law,  
2700 East Main Street, Suite 207  
PO Box 091022  
Bexley, Ohio 43209-1022

and upon plaintiff / client: Veronica Wagner Covatch  
1589 Mottern Rd  
Punxsutawney, PA 15767

and upon plaintiff / client: Michelle Wilson  
70 W Chestnut St. Apt. C  
Norwalk, OH 44857

  
Lloyd D. Cohen, Attorney at Law

12/11

IN THE FRANKLIN COUNTY MUNICIPAL COURT  
CIVIL DIVISION  
FRANKLIN COUNTY, OHIO

FILED  
14 OCT 28 AM 11:43  
FRANKLIN COUNTY  
MUNICIPAL COURT  
LORAIN, OHIO

Veronica Wagner Covatch, *et. al.*

Case No. 2014 CVF 024571

Plaintiffs,

Judge James P. O'Grady

v.

Central Ohio Sheltie Rescue, Inc., *et. al.*

Defendants.

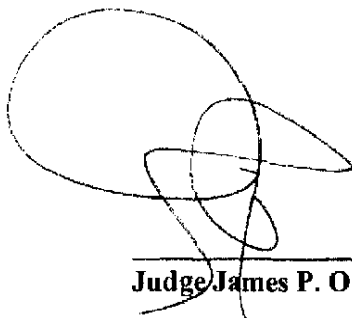
**ENTRY REMOVING LLOYD D. COHEN AS TRIAL ATTORNEY FOR PLAINTIFFS**

This matter comes before the Court on the Motion of Lloyd D. Cohen for an order authorizing his withdrawal as Trial Attorney for Plaintiffs Veronica Wagner Covatch and Michelle Wilson. The Court finds that the motion is well taken.

**IT IS THEREFORE ORDERED** that Lloyd D. Cohen is removed as counsel for and as Trial Attorney for Plaintiffs Veronica Wagner Covatch and Michelle Wilson.

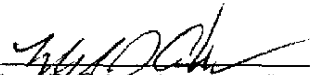
**IT IS FURTHER ORDERED** that he shall immediately mail a copy of this entry to the last known address of each said client.

**IT IS SO ORDERED.**



Judge James P. O'Grady

Submitted by:

  
Lloyd D. Cohen, Attorney at Law  
824 South High Street, Columbus, Ohio 43206  
Phone: 614-444-4211, Fax: 614-448-4522  
[Reg. No. 0012100]  
Email: lcohen@lloydcohen.com

RECEIVED  
2014 OCT 28 AM 11:13  
FRANKLIN COUNTY  
MUNICIPAL COURT  
LORAIN, OHIO

06/09/14

IN THE FRANKLIN COUNTY MUNICIPAL COURT  
CIVIL DIVISION  
FRANKLIN COUNTY, OHIO

FILED  
2014 OCT 30 AM 11:19

Veronica Wagner Covatch, *et al.*, :

Plaintiffs :

-vs.- :

Central Ohio Sheltie Rescue, Inc., *et al.*, :

Defendants :

CASE NO.: 2014-CVF-024571

**DEFENDANTS' STATEMENT OF QUALIFIED NON-OPPOSITION TO "MOTION TO  
AUTHORIZE LLOYD D. COHEN TO WITHDRAW AS TRIAL ATTORNEY FOR  
PLAINTIFFS"**

Now come the Defendants, Central Ohio Sheltie Rescue, Inc., and Penny Sanderbeck, and they say as follows in response to the "Motion to Authorize Lloyd D. Cohen to Withdraw as Trial Attorney for Plaintiffs" served to undersigned Counsel for the said Defendants on October 27, 2014.

The Defendants do not oppose the relief requested in the said Motion, *provided* that granting the requested relief shall not be deemed to justify any delay or continuance of this action beyond its now-existing schedule, and that if no other attorney has entered an appearance for the Plaintiffs on or before the date of the next scheduled Pre-Trial Conference on December 11, 2014, the Plaintiffs shall be required to proceed *pro se* and shall not be permitted to request additional time to obtain new counsel.

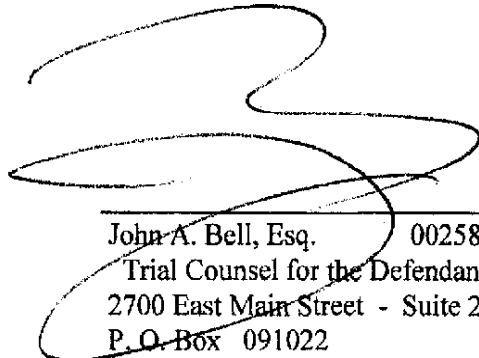
Respectfully submitted,

  
John A. Bell, Esq. 0025853  
Trial Counsel for the Defendants  
2700 East Main Street - Suite 207  
P. O. Box 091022  
Columbus, Ohio 43209  
Telephone: (614)-266-2961  
Facsimile: (614)-239-0543  
E-mail: JohnLegal@aol.com

**CERTIFICATE OF SERVICE**

I hereby certify that on this thirtieth (30<sup>th</sup>) day of October 2014, I have served a true copy of the foregoing DEFENDANTS' STATEMENT OF QUALIFIED NON-OPPOSITION TO "MOTION TO AUTHORIZE LLOYD D. COHEN TO WITHDRAW AS TRIAL ATTORNEY FOR PLAINTIFFS", upon counsel for the Plaintiffs by placing it in regular U.S. Mail, first class postage fully prepaid, addressed to:

Mr. Lloyd D. Cohen, Esq.  
Attorney-at-Law  
824 South High Street  
Columbus, Ohio 43206-1928



John A. Bell, Esq. 0025853  
Trial Counsel for the Defendants  
2700 East Main Street - Suite 207  
P. O. Box 091022  
Columbus, Ohio 43209  
Telephone: (614)-266-2961  
Facsimile: (614)-239-0543  
E-mail: JohnLegal@aol.com