

IN THE SUPREME COURT OF THE STATE OF DELAWARE

HENRY BLACK, MARY LOU BLACK,)
RAYMOND BUCHTA, W. SCOTT BLACK,)
and BLACKBALL PROPERTIES, LLC,)

Certain Defendants Below,)
Appellants)

v.)

GARY STAFFIERI and)
ADRIA CHARLES STAFFIERI,)

Plaintiffs Below,)
Appellees.)

No. 637, 2012

Case Below:
Court of Chancery

C.A. No. 7439-VCL

CONNOLLY GALLAGHER LLP'S MOTION TO WITHDRAW

Josiah R. Wolcott, Esquire, with the firm of Connolly Gallagher LLP ("Counsel"), attorney for Appellees, hereby moves pursuant to Supreme Court Rule 12(b) for an order granting Counsel leave to withdraw and respectfully represents:

1. Counsel acted as Delaware counsel in the case below.

2. Counsel files this motion based on Appellees' inability to come current with their legal bills. Appellees consent to this Motion to Withdraw. Appellees' consents are attached as Exhibit A.

3. Under these circumstances, withdrawal is appropriate under Delaware Lawyers' Rules of Professional Conduct, Rule 1.16(b)(5).

4. Appellees may from here forward be served at the following address:

Gary Staffieri & Adria Charles-Staffieri
100 Sackville Mills Lane
Wallingford, PA 19086

WHEREFORE, Counsel respectfully requests that the Court grant this Motion to Withdraw.

CONNOLLY GALLAGHER LLP



Josiah R. Wolcott (Del. Bar No. 4796)
267 East Main Street
Newark, Delaware 19711
(302) 888-6271
Attorney for
Plaintiffs Below, Appellee

Dated: February 18, 2013

EFiled: Feb 18 2013 05:09PM EST

Filing ID 49608570

Case Number 637,2012

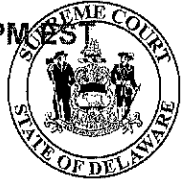



Exhibit A

CONSENT OF WITHDRAWAL

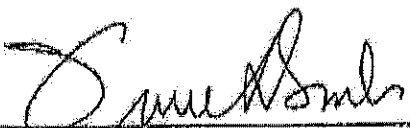
Commonwealth of Pennsylvania)
) SS
County of Delaware)

I, Gary Staffieri, being duly sworn according to law, hereby state and verify that I must consent to the withdrawal of Connolly Gallagher LLP and Josiah R. Wolcott (collectively "Counsel") from representing me in connection with the pending appeal in the Supreme Court of Delaware styled *Black, et al. v. Staffieri*, No. 637, 2012. I must consent to the withdrawal of Connolly Gallagher LLP and Josiah R. Wolcott (collectively "Counsel") due to Connolly Gallagher LLP and Josiah R. Wolcott's request for me to come current with their firm's invoices. I am not able to pay the requested amount at this time so I must consent.



Gary Staffieri

Sworn to and subscribed before me,
a Notary Public for the commonwealth and county
aforesaid, this 15 day of Feb, 2013.



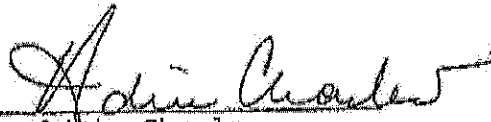
Notary Public

NOTARIAL SEAL
FRANCIS X SIMKISS
Notary Public
BROOKHAVEN BORO., DELAWARE COUNTY
My Commission Expires May 10, 2016

CONSENT OF WITHDRAWAL


Commonwealth of Pennsylvania)
) §§
 County of Delaware)

I, Adria Charles, being duly sworn according to law, hereby state and verify that I must consent to the withdrawal of Connolly Gallagher LLP and Josiah R. Wolcott (collectively "Counsel") from representing me in connection with the pending appeal in the Supreme Court of Delaware styled *Black, et al. v. Staffieri*, No. 637, 2012. I must consent to the withdrawal of Connolly Gallagher LLP and Josiah R. Wolcott (collectively "Counsel") due to Connolly Gallagher LLP and Josiah R. Wolcott's request for me to come current with their firm's invoices. I am not able to pay the requested amount at this time so I must consent.

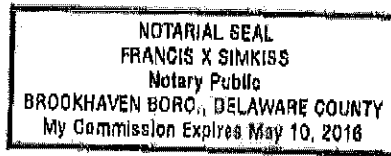


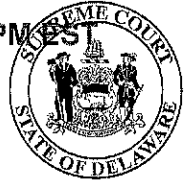
 Adria Charles

Sworn to and subscribed before me,
 a Notary Public for the commonwealth and county
 aforesaid, this 15 day of February, 2013.



 Notary Public





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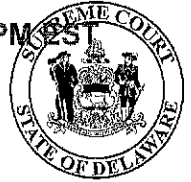
ORDER

This _____ day of _____ 2013, upon
consideration of Connolly Gallagher LLP's motion to
withdraw, the Court finds good cause to grant the motion.

NOW, THEREFORE IT IS ORDERED that Connolly Gallagher
LLP's motion to withdraw is GRANTED.

SO ORDERED this _____ day of _____, 2013

Justice



CERTIFICATE OF SERVICE

I hereby certify that on the 18th day of February, 2013, I caused the foregoing Connolly Gallagher LLP's Motion to Withdraw to be served on the following in the manner indicated:

VIA LEXISNEXIS FILE & SERVE:

Richard Abbott, Esquire
724 Yorklyn Road, Suite 240
Hockessin, Delaware 19707

A handwritten signature in black ink, appearing to read "J. R. Wolcott", written over a horizontal line.

Josiah R. Wolcott (Del. Bar No. 4796)