

IN THE ILLINOIS INDEPENDENT TAX TRIBUNAL

JOHN M. CONNOLLY and )  
MICHAEL R. MCDONALD, )  
Petitioners, )  
v. )  
The ILLINOIS DEPARTMENT )  
OF REVENUE, )  
Defendants. )

No. 14 TT 66  
Judge Brian F. Barov

**NOTICE OF FILING**

**PLEASE TAKE NOTICE** that on September 11<sup>th</sup>, 2015 the undersigned filed the **MOTION TO WITHDRAW AS COUNSEL**, a copy of which is herewith served upon you.

**In accordance with Rule 13 of the Illinois Supreme Court Rules, Plaintiffs, John M. Connolly and Michael R. McDonald are hereby advised that they should retain other counsel in this cause and file with the clerk of the Illinois Independent Tax Tribunal, within 21 days after entry of the order of withdrawal, their supplementary appearance stating therein an address at which service of notices or other documents may be had upon them.**

Respectfully submitted,

**JOHN M. CONNOLLY and  
MICHAEL R. MCDONALD**

  
\_\_\_\_\_  
One of Petitioners' Attorneys

Fred O. Marcus  
Christopher T. Lutz  
Horwood Marcus & Berk Chartered  
500 West Madison St., Ste. 3700  
Chicago, IL 60661  
(312) 606-3210



4. No prejudice will come to any of the parties by the withdrawal of HMB as counsel for Petitioners.

5. This motion is being brought of good faith reasons and not for purposes of delay.

WHEREFORE, the law firm of Horwood Marcus & Berk Chartered respectfully requests this Court enter an Order:

- (a) granting it leave to withdraw its appearance on behalf of Petitioners, John M. Connolly and Michael R. McDonald, in this matter;
- (b) granting Petitioners, John M. Connolly and Michael R. McDonald, 21 days to file a supplementary appearance herein; and
- (c) for such further relief as this Court deems just and necessary.

Respectfully submitted,

**JOHN M. CONNOLLY and MICHAEL R.  
MCDONALD**

Petitioners

By: \_\_\_\_\_

One of Its Attorneys

Fred O. Marcus  
Christopher T. Lutz  
**HORWOOD MARCUS & BERK CHARTERED**  
500 West Madison Street, Suite 3700  
Chicago, Illinois 60661  
(312) 606-3200

**CERTIFICATE OF SERVICE**

Undersigned counsel of record hereby certifies that he served a copy of the foregoing **NOTICE OF FILING** and **MOTION TO WITHDRAW AS COUNSEL** on counsel of record listed below by having the same sent by email before the hour of 5:00 p.m. on September 11<sup>th</sup>, 2015, as follows:

George W. Foster  
Special Assistant Attorney General  
Illinois Department of Revenue  
James R. Thompson Center  
100 West Randolph Street, Level 7  
Chicago, Illinois 60601



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Undersigned counsel of record hereby certifies that he served a copy of the foregoing **NOTICE OF FILING** and **MOTION TO WITHDRAW AS COUNSEL** on Petitioners, John M. Connolly and Michael R. McDonald, by email and certified mail to the following address before the hour of 5:00 p.m. on September 11<sup>th</sup>, 2015:

John M. Connolly Sr. ([jconnollysr@keycodemedia.com](mailto:jconnollysr@keycodemedia.com))  
204 Sunset Terrace Drive  
Medina, IL 60157

Michael R. McDonald ([mikemcdonald350@gmail.com](mailto:mikemcdonald350@gmail.com))  
13820 Fairfield Court  
Elm Grove, WI 53122-2473



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