Hearing Date: No hearing scheduled
Location: <<CourtRoomNumber>>
Judge: Calendar, 64

FILED
8/18/2026 12:02 PM
Mariyana T. Spyropoulos
CIRCUIT CLERK
COOK COUNTY, IL
2025CH10558
Calendar, 64
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FILED DATE: 8/18/2026 12:02 PM 2025CH10558

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS

COUNTY DEPARTMENT, CHANCERY DIVISION

FIRST BANK OF HIGHLAND PARK, a Division of First Bank Chicago, an Illinois Corporation,	)	
	)	
Plaintiff,	)	
	)	Case No. 2025CH10558
v.	)	
	)	
THE FULTON BUILDING, LLC, an Illinois limited liability company; MICHAEL FEDEROW, an Individual; and UNKNOWN OWNERS AND NON-RECORD CLAIMANTS,	)	
	)	
Defendants.	)	

MOTION TO WITHDRAW

NOW COMES Erica C. Minchella of Minchella & Associates, LTD ("Counsel"), attorney of record for Michael Federow ("Federow") in the above captioned matter, and pursuant to Illinois Supreme Court Rule 13(c) and Illinois Rule of Professional Conduct 1.16, respectfully moves this Court for entry of an order granting leave to withdraw as counsel of record due to a conflict of interest, and in support thereof states as follows:

1. Counsel is the attorney of record for Michael Federow in the above captioned action, which was filed on or about June 12, 2026 and remains pending before this Court.
2. Subsequent to Counsel's undertaking of this representation, Counsel became aware of a conflict of interest as defined by Illinois Rule of Professional Conduct 1.7.
3. This conflict of interest was not known to Counsel, and could not have been known to Counsel, at the time the representation commenced.

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4. Continued representation of Federow under these circumstances would violate Counsel's obligations under the Illinois Rules of Professional Conduct, including the duties of loyalty and confidentiality owed to a current or former client, and no informed consent sufficient to waive the conflict, confirm in writing, can be obtained. See Ill. R. Prof'l Conduct 1.7(b).
5. Withdrawal can be accomplished without material adverse effect on the interest of Federow no dispositive motions are currently pending and no trial date has been set.
6. In accordance with Illinois Supreme Court Rule 13(c)(2), Counsel has served Federow with notice of this motion by Certified Mail at 270 N. Washtenaw 60612, advising Federow that he must obtain substitute counsel on or before the return date of this motion, or risk default or other adverse action.
7. No party will be prejudiced by the granting of this motion, and the interest of justice, together with Counsel's ethical obligations under Rule 1.7 favor allowing withdrawal.

WHEREFORE, Erica C. Minchella respectfully requests that this Honorable Court enter an order:

A. Granting Counsel leave to withdraw as attorney of record for Michael Federow;
B. Directing Michael Federow to obtain substitute counsel within twenty-one days.
C. Granting such other and further relief as this Court deems just and proper.

Respectfully submitted,

/s/ Erica C. Minchella
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