

<p>CRIMINAL COURT, DENVER COUNTY, COLORADO</p> <p>Court Address: Denver County Court Lindsey-Flanigan Courthouse 520 W Colfax Ave Denver, CO 80204</p>	<p style="text-align: center;">▲ COURT USE ONLY ▲</p>
<p>THE PEOPLE OF THE STATE OF COLORADO, Plaintiff, v. Laurence Goodman, Defendant</p>	
<p>Braverman Law Group LLC 1823 Folsom St, Ste. 101 Boulder, CO 80302</p> <p>Phone Number: 303-800-1588 E-mail: diedre@braverman-law.com FAX Number: 303-497-8408 Atty. Reg. #: 42101</p>	<p>Case Number: 17CR10088</p> <p>Division: 4G Courtroom: 1G</p>
<p>NOTICE OF REQUEST TO WITHDRAW</p>	

TO: Laurence Goodman, 1400 Bacchus Dr, Unit A, Lafayette, CO 80026

TAKE NOTICE that, pursuant to Crim.P.Rule 44, your attorney has moved this Court to enter an Order allowing her to withdraw as your attorney of record for reasons stated in the Motion to Withdraw which she has filed with the Court and a copy of which is attached.

You have the right to object to the withdrawal, and a hearing will be held and withdrawal will only be allowed if the court approves. You are further notified that if the withdrawal is allowed, you will have the obligation to hire other counsel, request the appointment of counsel by the court or elect to represent yourself.

You have the obligation to appear at all previously scheduled court dates and if you fail or refuse to meet these obligations, the Court may issue a warrant for your arrest; the dates of any proceeding, including trial, and the holding of such proceeding will not be affected by the withdrawal of counsel.

The status of your case is as follows: You have a status conference scheduled for Wednesday, June 20th, 2018 at 10am located at courtroom 1G at the Lindsey-Flanigan Courthouse, 520 W. Colfax Ave, Denver, CO 80204.

Respectfully submitted this 15th day of June, 2018,

*[Signed original is on file at
Braverman Law Group LLC]*

s/

Diedre Braverman

Attorney for Defendant

Attorney Registration No. 42101

1823 Folsom, St., Ste. 101

Boulder, CO 80302

CERTIFICATE OF SERVICE

I CERTIFY that on the 15th day of June, 2018, I did mail/deliver a copy of the foregoing Motion to Withdraw together with Notice of Request to Withdraw attached to the above-named defendant at the last known address as shown below:

Via USPS:
Laurence Goodman
P.O. Box 3792

Boulder, CO 80307

*[Signed original is on file at
Braverman Law Group LLC]*

*s /
Jamie Karpo*

DENVER COUNTY COURT LINDSEY-FLANIGAN COURTHOUSE 520 W COLFAX AVE DENVER, COLORADO 80204	<COURT USE ONLY>
THE PEOPLE OF THE STATE OF COLORADO, vs. LAURENCE GOODMAN Defendant.	
BRAVERMAN LAW GROUP LLC 1823 Folsom St Ste 101 Boulder, CO 80302 Attorney for the Defendant Phone Number: 303-800-1588 Fax Number: 303-479-8408 E-mail: Diedre@braverman-law.com Atty. Reg. #: 42101	Case Number: 17CR10088 Courtroom: 1G
MOTION TO WITHDRAW	

The undersigned, as counsel of record for Defendant Laurence Rene Goodman, hereby respectfully moves to withdraw from further representation of Mr. Goodman in this case. In support hereof, the undersigned states as follows:

1. The undersigned entered her appearance in this case on January 7, 2018, and appeared in Court on Mr. Goodman's behalf on February 13, 2018 and April 4, 2018. The undersigned obtained a continuance on the Jury Trial.
2. Since entering her appearance, the undersigned has also:
 - a. Obtained discovery from the Attorney General's Office and commenced a review of a substantial amount of that material;
 - b. Evaluated and discussed a plea deal with Mr. Goodman;
 - c. Assisted in the coordination of a Competency Evaluation for Mr. Goodman; and
 - d. Attempted without success on numerous occasions to discuss the case and strategy with Mr. Goodman.
3. It has become apparent that a significant and irreconcilable difference has arisen regarding Mr. Goodman's representation that prevents the undersigned from continuing to represent Mr. Goodman. If Mr. Goodman subsequently elects to secure other counsel, the undersigned will work with that counsel to help bring him or her up to speed.
4. The undersigned attempted to contact Mr. Goodman to discuss his defense and this situation repeatedly, most often without success.

5. The undersigned has provided the thumb drive of discovery she received from the Attorney General's Office to Mr. Goodman in person.

6. The undersigned mailed a copy of this Motion to Mr. Goodman at his PO Box on June 15, 2018.

WHEREFORE, the undersigned respectfully requests that the Court enter an order granting the undersigned's withdrawal from any further representation of Defendant Laurent Rene Goodman in this case.

Respectfully submitted this 15th day of June 2018.

*[Signed original is on file at
Braverman Law Group LLC]*

s / Diedre Braverman

Diedre Braverman, #42101
Braverman Law Group, LLC
1823 Folsom St, Suite 101
Boulder, Colorado 80302
Phone: 303-800-1588
Fax: 303-479-8408
Diedre@braverman-law.com

Attorney for Defendant
Laurence Rene Goodman

CERTIFICATE OF SERVICE

I hereby certify that on the 15th day of June 2018, a true and correct copy of the foregoing Motion to Withdraw was served electronically via ICCES and/or U.S. Mail to the following:

Office of the Attorney General
Colorado Department of Law
Ralph L. Carr Judicial Building
1300 Broadway, 10th Floor
Denver, CO 80203

Via U.S. Mail:
Laurence Goodman
P.O. Box 3792
Boulder, CO 80307

*[Signed original is on file at
Braverman Law Group LLC]*

s / Jamie Karpo
