

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

SEAN PAUL REYES,)	
)	
Plaintiff,)	Case No. 1:22-cv-07339
)	
v.)	Magistrate Judge Valdez
)	
RICHARD VOLANTI, DETECTIVE MONACO, OFFICER GHILONI, and RUTH SIABA Individually, the CITY OF BERWYN, A Municipal Corporation,)	Judge Steven Seeger
)	
Defendants.)	

MOTION TO WITHDRAW AS COUNSEL

NOW COMES Plaintiff SEAN PAUL REYES’ attorneys of record for Plaintiff, Brian Orozco, Gregory E. Kulis, and Kenneth Young Hurst from GREGORY E. KULIS AND ASSOCIATES, hereby moving this Honorable Court to withdraw as Plaintiff’s attorneys of record, for the reasons stated below:

1. The Plaintiff, SEAN PAUL REYES (hereinafter referred to as “Plaintiff”), filed this First amended Complaint on April 26, 2023.
2. Gregory E. Kulis, Brian Orozco and Kenneth Young Hurst filed their appearances on behalf of Plaintiff.
3. Plaintiff’s attorneys have significant, irreconcilable differences with the Plaintiff concerning communications and the management of the litigation and orders by this Court.
4. Given these circumstances, Plaintiff’s attorneys are unable to effectively and properly represent the Plaintiff.

5. Therefore, the above-referenced attorneys move to withdraw as attorneys of record on behalf of the Plaintiff and to no longer be sent further notices of the Court.
6. The Plaintiff has been notified in writing and telephone of the intention of the forgoing attorneys to withdraw as his counsel.
7. The above-referenced attorneys request that the Plaintiff be provided a fair opportunity to obtain new counsel.
8. On February 4, 2025, Counsel for Plaintiff emailed Plaintiff the minute entry [Dkt #117] and the motion [Dkt #115].
9. All further notices to Plaintiff's attention should be sent directly to the Plaintiff at:

Sean Paul Reyes
66 S Village Drive
Bellport, NY 11713

WHEREFORE, Plaintiff SEAN PAUL REYES' attorneys, Gregory E. Kulis, Brian Orozco, and Kenneth Young Hurst of GREGORY E. KULIS AND ASSOCIATES respectfully request that this Honorable Court enter an order granting their motion to withdraw their appearances on behalf of the Plaintiff in this matter.

Dated: February 5, 2025

Respectfully submitted,

/s/Gregory E. Kulis
Gregory E. Kulis
One of Plaintiffs' Attorneys

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CERTIFICATE OF SERVICE

The undersigned non-attorney hereby certifies that the above **Motion to Withdraw as Counsel** was filed on February 5, 2025 with the Northern District of Illinois ECF System, serving a copy on all parties.

/s/ Brooklyn Mychalowych
Brooklyn Mychalowych