

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

UNITED STATES OF AMERICA *ex rel.* )  
ROXANNE KLINE, and ROXANNE )  
KLINE, individually, )

Plaintiffs, )

v. )

DOCS AT THE DOOR, P.C., AJIBOLA )  
AYENI, BANIO KOROMA, FIRAS )  
ZAHWE, GATEWAY HEALTH )  
SYSTEMS, INC., and JOY H. TURNER- )  
AYENI, )

Defendants. )

No. 13 C 7837

Judge Pallmeyer

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UNITED STATES OF AMERICA, )  
Plaintiff-Intervenor, )

v. )

DOCS AT THE DOOR, P.C., AJIBOLA )  
AYENI, GATEWAY HEALTH )  
SYSTEMS, INC., and JOY H. TURNER- )  
AYENI, )

Defendants. )

**RENEWED MOTION FOR LEAVE TO WITHDRAW**  
**AS COUNSEL FOR ROXANNE KLINE**

Pursuant to Rule 83.17 of the Local Rules for the United States District Court for the Northern District of Illinois, attorney Michael C. Rosenblat moves this Honorable Court for leave to withdraw as counsel for Roxanne Kline, and in support thereof, states the following:

1. On January 26, 2022, Counsel filed a Motion for Leave to Withdraw. (Dkt 84).

That motion was denied without prejudice. Counsel’s renewed motion to withdraw provides

reasons for the withdrawal, without disclosing confidential communications, and counsel's bases that Ms. Kline will not be adversely effected.

2. On January 21, 2022, Ms. Kline left a voice message with AUSA Sarah North and stated that she no longer wanted Counsel to represent her on this matter. Pursuant to Illinois Rule of Professional Conduct 1.16 (a)(3) having been discharged from this representation Counsel shall withdraw. The request to withdraw is mandatory.

3. Ms. Kline was provided with a copy of this Court's Minute Order dated January 27, 2022. (Dkt 85.)

4. Rule 1.16(b) lists permissible reasons for withdrawing. Subparagraphs (6) unreasonably difficult and subparagraph (1) without material adverse effect are applicable, as is comment 8, refusal to abide by terms of the agreement related to representation.

5. Ms. Kline will not be adversely effected by this withdraw. This False Claims Act case was filed under seal on November 1, 2013. Served on the government along with the Complaint were disclosures of material evidence. The government conducted an investigation and filed a Complaint in Intervention on October 17, 2017 (Dkt 26) intervening against all defendants except for Dr. Koroma and Dr. Zahwe. Ms. Kline is "represented" by counsel on the intervened claims. Ms. Kline has adequate time to retain replacement counsel if she chooses to do so as no responsive pleadings have yet been filed.

6. A copy of this motion and notice informing Plaintiff that counsel will be seeking permission from the Court to withdraw from the case, and here in advising her to seek new counsel, along with a notification of party contact form has been emailed and mailed to Plaintiff at her last known address.

WHEREFORE, Mr. Rosenblat, respectfully requests the Court enter an order authorizing him to withdraw as counsel for Plaintiff Roxanne Kline.

Respectfully Submitted,

s/Michael C. Rosenblat  
Michael C. Rosenblat  
Counsel for Roxanne Kline

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**CERTIFICATE OF SERVICE**

I, Michael C. Rosenblat, an attorney, certify that I caused copies of the foregoing **Renewed Motion for Leave to Withdraw as Counsel for Roxanne Kline**, to be served pursuant to ECF as to Filing Users and via electronic delivery or U.S. Mail, proper postage prepaid, to the following individual.

s/ Michael C. Rosenblat

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