

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TENNESSEE  
WESTERN DIVISION**

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ACLU OF TENNESSEE, Inc.	)	
	)	
Intervening Plaintiff,	)	
	)	
v.	)	No. 2:17-cv-2120-JPM-jay
	)	
THE CITY OF MEMPHIS,	)	
	)	
Defendant.	)	
	)	

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**MOTION TO WITHDRAW AS COUNSEL  
FOR INTERVENING PLAINTIFF ACLU OF TENNESSEE, INC.**

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Pursuant to Local Rule 83.5, attorney Thomas H. Castelli, counsel for intervening plaintiff ACLU of Tennessee, Inc., hereby moves to withdraw from representation in this case and in support shows as follows:

1. The undersigned Thomas H. Castelli previously entered an appearance as counsel for intervening plaintiffs in this matter.
2. Mr. Castelli is leaving the employment of the American Civil Liberties Union Foundation of Tennessee, Inc. for a different employment opportunity in another state.
3. Attorney Stella Yarbrough of the ACLU Foundation of Tennessee, Inc, who is counsel of record in this case and a duly admitted member of this Court’s bar, will continue to represent plaintiff.
4. Mandy Strickland Floyd of the law firm Spencer Fane, who is also counsel

of record in this case and a duly admitted member of this Court's bar, will continue to represent plaintiff.

5. Mr. Castelli's withdrawal from the case will not delay any action in the case.

6. Counsel for Defendant have been informed of Mr. Castelli's departure and do not oppose this motion.

7. A proposed order granting this motion is being submitted as directed by this Court's Local Rules of Court.

WHEREFORE, it is respectfully requested that attorney Thomas H. Castelli be granted leave to withdraw as counsel for intervening plaintiffs in this matter.

Respectfully submitted, this the 2nd day of February 2022.

/s/ Thomas H. Castelli  
Thomas H. Castelli, BPR# 24849  
ACLU Foundation of Tennessee  
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ATTORNEY FOR PLAINTIFF  
ACLU of Tennessee, Inc.

**CERTIFICATE OF CONSULTATION**

Pursuant to Local Rule 7.2(a)(B), counsel for Plaintiff Thomas H. Castelli notified counsel for Defendant Jennie Silk, Bruce McMullen and Mark Glover, via email, of his departure from ACLU Foundation of Tennessee and his intent to file this Motion to Withdraw as Counsel. Counsel for Defendant, Ms. Silk, responded that Defendant does not oppose the motion.

**CERTIFICATE OF SERVICE**

I hereby certify that on February 2, 2022 a true and correct copy of the foregoing document has been served via the Court Electronic Case Filing system to:

Attorneys for Defendant, City of Memphis

R. Mark Glover  
Jennie Vee Silk  
Mary Wu Tullis  
Bruce A. McMullen  
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/s/ Thomas H. Castelli  
Thomas H. Castelli