

**DKT (23)**



**AGREED MOTION FOR WITHDRAWAL OF ATTY  
BACALIS**

**FILED ON: 02/06/2024**

**FEE: \$0.00**

**FILER/REQUESTOR: DAN BACALIS**

322-744263-23

CAUSE NO. 322-744263-23

FILED  
 TARRANT COUNTY  
 2/6/2024 4:28 PM  
 THOMAS A. WILDER  
 DISTRICT CLERK

**IN THE MATTER OF THE  
MARRIAGE OF**  
  
**MORGAN MICHELLE MYERS  
AND  
CHARLES DUSTIN MYERS**  
  
**AND IN THE INTEREST OF**  
**M [REDACTED] M [REDACTED] AND**  
**C [REDACTED] R [REDACTED] M [REDACTED],**  
**CHILDREN**

**§ IN THE DISTRICT COURT**  
**§**  
**§**  
**§ 322ND JUDICIAL DISTRICT**  
**§**  
**§**  
**§**  
**§ TARRANT COUNTY, TEXAS**

**AGREED MOTION FOR WITHDRAWAL OF ATTORNEY**

Pursuant to Rule 10 of the Texas Rules of Civil Procedure, Daniel R. Bacalis on behalf of CHARLES DUSTIN MYERS files this Agreed Motion for Withdrawal of Attorney as attorney in charge for CHARLES DUSTIN MYERS, Respondent, and states as follows:

1. This is a suit for dissolution of marriage between the parties and affecting the parent-child relationship.
2. Discovery is being conducted under Level 2.
3. The following are children subject to the suit, and their ages are as follows:

<u>Name</u>	<u>Age</u>
M [REDACTED] E [REDACTED] M [REDACTED]	7 years
C [REDACTED] R [REDACTED] M [REDACTED]	5 years

4. Daniel R. Bacalis, attorney in charge for CHARLES DUSTIN MYERS, the Respondent, petitions this Court to withdraw as the attorney for CHARLES DUSTIN MYERS, and in support of this Motion, Daniel R. Bacalis shows the Court:

5. CHARLES DUSTIN MYERS has agreed and consented to this Motion.

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6. CHARLES DUSTIN MYERS has been delivered a copy of this Motion, and has been notified in writing of the right to object to this Motion. The last known address for CHARLES DUSTIN MYERS is [REDACTED].

7. This request for withdrawal is not sought for delay only.

8. There are no pending settings or deadlines in this case.

9. Daniel R. Bacalis petitions this Court to grant this Motion for Withdrawal of Attorney and remove Daniel R. Bacalis as attorney of record and attorney in charge for CHARLES DUSTIN MYERS and for general relief.

Respectfully submitted,

Daniel R. Bacalis PC  
669 Airport Freeway  
Suite 307  
Hurst, TX 76053  
Office Phone: (817) 498-4105  
Fax: (817) 282-0634

/s/ Daniel R. Bacalis \_\_\_\_\_

Daniel R. Bacalis  
Attorney for CHARLES DUSTIN MYERS  
State Bar No: 01487550  
Email: dbacalis@dbacalis.com

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A CERTIFIED COPY  
ATTEST: 04/15/2024  
THOMAS A. WILDER  
DISTRICT COURT  
TARRANT COUNTY, TEXAS  
BY: /s/ Catherine Saenz

**Certificate of Service**

I certify that a true copy of this document was served in accordance with Rule 21a of the Texas Rules of Civil Procedure on the following on February \_\_\_, 2024.

Cooper L. Carter by electronic filing manager at cooper.carter@majadmin.com.

/s/ Daniel R. Bacalis  
Daniel R. Bacalis  
Attorney for CHARLES DUSTIN MYERS

AGREED:

/s/ Charles Dustin Myers  
CHARLES DUSTIN MYERS

**AGREED MOTION FOR WITHDRAWAL OF ATTORNEY - Page 3 of 3**  
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A CERTIFIED COPY  
ATTEST: 04/15/2024  
THOMAS A. WILDER  
DISTRICT COURT  
TARRANT COUNTY, TEXAS  
BY: /s/ Catherine Saenz

**Automated Certificate of eService**

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Lindsey McNabb on behalf of Daniel Bacalis

Bar No. 1487550

lmcnabb@dbacalis.com

Envelope ID: 84215421

Filing Code Description: Motion (No Fee)

Filing Description: Agreed Motion for Withdrawal of Attorney

Status as of 2/7/2024 10:29 AM CST

Associated Case Party: MORGANMICHELLEMYERS

Name	BarNumber	Email	TimestampSubmitted	Status
Cooper L.Carter		coopercarter@majadmin.com	2/6/2024 4:28:16 PM	SENT

