

DKT (23)



**AGREED MOTION FOR WITHDRAWAL OF ATTY
BACALIS**

FILED ON: 02/06/2024

FEE: \$0.00

FILER/REQUESTOR: DAN BACALIS

322-744263-23

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

CAUSE NO. 322-744263-23

**IN THE MATTER OF THE
MARRIAGE OF**

**MORGAN MICHELLE MYERS
AND
CHARLES DUSTIN MYERS**

**AND IN THE INTEREST OF
M [REDACTED] E [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.

AGREED MOTION FOR WITHDRAWAL OF ATTORNEY - Page 1 of 3

L:\Documents\Clients\MYERS, CHARLES\Motion for Withdrawal of Attorney - 2-5-24.docx



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

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



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 cooperclarter@majadmin.com.

/s/ Daniel R. Bacalis

Daniel R. Bacalis

Attorney for CHARLES DUSTIN MYERS

AGREED:

/s/ Charles Dustin Myers
CHARLES DUSTIN MYERS



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