

No useful purpose would be served by Christina Utley or me commenting on why our attorney/client relationship with Robert Bashara has ceased. Suffice it to say that there has been a breakdown in that relationship; a result of which required us to file a motion to withdraw as counsel to Mr. Bashara. To comment would do neither Robert Bashara, the Bashara family nor the Ellerbrecht family any good. To say anything more would only intensify the media feeding frenzy which has made it difficult, if not impossible, for Mr. Bashara to get a fair trial, and therefore would not be in the best interest of justice.

When the two Robert Bashara cases have been fully and completely litigated, both Christina Utley and I will be available to answer some of your non-attorney/client privileged questions. In the meantime, however, we hope for two things. First, that the killer(s) of Jane Bashara is found and fully prosecuted under the law. Secondly, but most importantly, that both the Bashara and Ellerbrecht families find some measure of peace as they continue to heal from the pain that has consumed their lives.

36TH DISTRICT COURT
JUL 18 PM 1:58

STATE OF MICHIGAN

IN THE 36th DISTRICT COURT FOR THE CITY OF DETROIT

STATE OF MICHIGAN,

Plaintiff,

Case No. 12- 60646
Hon. Kenneth King

-v-

ROBERT BASHARA,

Defendant.

KYM WORTHY (P38875)
Wayne County Prosecuting Attorney
1441 St. Antoine
Detroit, MI 48226
(313) 224-5777

CHRISTINA UTLEY (P58477)
DAVID GRIEM (P23187)
Attorneys for Defendant
500 Griswold Avenue, Suite 2400
Detroit, MI 48226
(313) 961-1200

JAFFE RAITY HEUER & WEISS, P.C.

EMERGENCY MOTION TO WITHDRAW AS COUNSEL

Christina Utley and David Griem, counsel for Defendant, Robert Bashara

("Defendant"), move this Honorable Court to withdraw as counsel for the following

reasons:

1. Defendant is charged by way of a Complaint with one count of Soliciting to Commit Murder, in violation of MCL 750.157 B 2.
2. Prior to being charged in the above-captioned cause, Defendant retained undersigned Counsel to represent him.
3. There has been an irreparable breakdown in the attorney/client relationship as a result of which the undersigned move to withdraw as counsel.

Respectfully submitted,



Christina Utley (P58477)
David Griem (P23187)
Counsel for Defendant
500 Griswold Avenue, Ste. 2400
Detroit, MI 48226
(313) 961-1200

Dated: July 18, 2012

JAFFE RAITT KEUER & WEISS, P.C.

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NOTICE OF HEARING

TO: Counsel of Record

PLEASE TAKE NOTICE that the Emergency Motion to Withdraw as Counsel attached hereto, will be brought on for hearing in the 36th Judicial District Court, before the Honorable Kenneth King, on Thursday, July 19, 2012, commencing at 8:30 a.m. or as soon thereafter as counsel may be heard.

Respectfully submitted,



Christina Utley (P58477)
David Griem (P23187)
Counsel for Defendant
500 Griswold Avenue, Ste. 2400
Detroit, MI 48226
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Dated: July 18, 2012

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PROOF OF SERVICE

I, David Griem, certify that on July 18, 2012, I personally served the **EMERGENCY MOTION TO WITHDRAW AS COUNSEL; NOTICE OF HEARING; and PROOF OF SERVICE** upon the following:

Kym Worthy
Wayne County Prosecuting Attorney
1441 St. Antoine
Detroit, MI 48226


David Griem

JAFFE BAITT HEUER & WEISS, P.C.