

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WISCONSIN

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DR. SABINA BURTON,  
Plaintiff,

v.

Case No. 14-CV-274

BOARD OF REGENTS UNIVERSITY OF  
WISCONSIN, et al.,  
Defendants.

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**DECLARATION OF TIMOTHY E. HAWKS  
IN SUPPORT OF MOTION TO WITHDRAW AS COUNSEL**

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Pursuant to 28 U.S.C. § 1746, Timothy E. Hawks declares, as follows:

1. I am an attorney representing the Plaintiff in the above-named matter and I make this declaration based on personal knowledge to support the motion of Timothy E. Hawks and B. Michele Sumara, of Hawks Quindel, S.C. (counsel), to withdraw as counsel for Plaintiff Dr. Sabina Burton.

2. Following this Court's opinion and order granting summary judgment to Defendants (Dkt. 90) and judgment to Defendants, dismissing this case (Dkt. 91), Dr. Burton has insisted on a course of action with which counsel has a fundamental disagreement.

3. This fundamental disagreement between Dr. Burton and counsel could not be resolved following their consultation.

4. This fundamental disagreement between Dr. Burton and counsel is so significant that it prevents counsel from providing continuing, adequate representation to Dr. Burton.

5. This fundamental disagreement has resulted in Dr. Burton's attempted *pro se* filing of March 29, 2016 (Dkt. 93).

6. This fundamental disagreement has made it impossible for counsel to fulfill their professional responsibilities to Dr. Burton and to the Court, rendering counsel's continued representation of Dr. Burton no longer viable, under Wis. SCR 20:1.16(b)(4).

7. Counsel has given reasonable notice to Dr. Burton of their intent to withdraw as counsel.

8. I declare under penalty of perjury that the foregoing is true and correct.

Executed on April 1, 2016

s/Timothy E. Hawks  
Timothy E. Hawks, SBN 1005646