

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MINNESOTA**

CAPITOL RECORDS INC., a Delaware corporation; SONY BMG MUSIC ENTERTAINMENT, a Delaware general partnership; ARISTA RECORDS LLC, a Delaware limited liability company; INTERSCOPE RECORDS, a California general partnership; WARNER BROS. RECORDS INC., a Delaware corporation; and UMG RECORDINGS, INC., a Delaware corporation,

Plaintiffs,

v.

Jammie Thomas,

Defendant.

Case No. 06-cv-1497 (MJD/RLE)

**DEFENDANT’S COUNSEL’S
MOTION FOR SUBSTITUTION OF
COUNSEL AND AMENDMENT OF
DEFENDANT’S COUNSEL’S SECOND
MOTION TO WITHDRAW AS
COUNSEL (DKT. NO. 245)**

Defendant’s undersigned counsel hereby amends his pending motion for an order permitting him to withdraw as her attorney (Dkt. No. 245), instead moving the Court for an order permitting him to withdraw and allowing the substitution of Garrett Blanchfield and Reinhardt, Wendorf & Blanchfield of St. Paul, Minnesota, who would then move K.A.D. Camara of the law firm of Camara – Sibley of Houston, Texas, as counsel pro hac vice who would thereafter be defendant’s lead trial counsel.

Declarations of said putative local counsel and trial counsel, expressing their intent, have been concurrently filed with this submission.

Grounds for the motion are that movant has caused there to be highly competent, substituted counsel, intimately familiar with the case, who do not require a continuance respecting any of the scheduled proceedings, including trial.

Your movant avows that he has spoken to plaintiffs' counsel Timothy Reynolds who has authorized the undersigned to represent to the Court that plaintiffs continue to take no position respecting the motion to withdraw and this amendment, provided there is no continuance requested, which there is not.

Your movant also avows that he has been authorized by defendant to represent to the Court that she has no objection to the substitution of counsel sought.

Respectfully submitted,

Dated: May 19, 2009

CHESTNUT & CAMBRONNE, P.A.

By /s/ Brian N. Toder
Brian N. Toder (No. 17869X)
3700 Campbell Mithun Tower
222 South Ninth Street
Minneapolis, MN 55402
(612) 339-7300
Fax (612) 336-2940

ATTORNEYS FOR DEFENDANT