

Hertha L. Lund
Lund Law PLLC
662 S. Ferguson Ave., Unit 2
Bozeman, MT 59718
Telephone: (406) 586-6254
Facsimile: (406) 586-6259
Lund@Lund-Law.com

Attorneys for Katherine Anne Proctor

**IN THE SUPREME COURT OF THE STATE OF MONTANA
No. DA 23-0410**

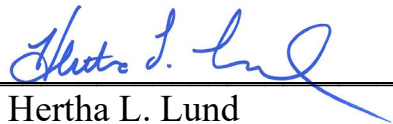
<p>IN THE MATTER OF: P. P.,</p> <p>A Youth in Need of Care.</p>	<p>MOTION TO WITHDRAW AS COUNSEL AND MOTION TO APPOINT MONTANA APPELLATE DEFENDER DIVISION</p>
---	---

NOTICE is given that Appellant, Katherine Anne Proctor, who is the mother of P.P. and whose parental rights were terminated in the Cause No. CDN-2021-88 filed in the First Judicial District, County of Lewis and Clark, has now spent all of her resources defending herself during the District Court trial and can no longer afford to hire legal counsel. Ms. Proctor is in jail and has been sentenced to twenty years in prison. She now needs to have legal counsel appointed for her. During the

hearing on the State's Petition for Termination Ms. Proctor was represented by Scott Albers, who has recently been diagnosed with a terminal disease and is no longer practicing law. I, Hertha L. Lund, joined Ms. Proctor's case during this hearing. Since Ms. Proctor is now indigent and needs qualified appellate counsel to represent her, I hereby file this motion to be allowed to withdraw as Ms. Proctor's legal counsel. Also, I motion the Court to appoint the Montana Appellate Defender Division (MADD) to represent Ms. Proctor in this appeal.

DATED this 31th day of July, 2023.

Lund Law, PLLC

By: 

Hertha L. Lund
Attorney for Katherine Anne Proctor

CERTIFICATE OF SERVICE

I, Hertha Louise Lund, hereby certify that I have served true and accurate copies of the foregoing Motion - Withdrawal of Counsel to the following on 07-31-2023:

Mary Leffers Barry (Govt Attorney)
228 Broadway
Lewis & Clark County Attorney Office
Helena MT 59601
Representing: State of Montana
Service Method: eService

Austin Miles Knudsen (Govt Attorney)
215 N. Sanders
Helena MT 59620
Representing: State of Montana
Service Method: eService

Electronically signed by Genevieve Martin on behalf of Hertha Louise Lund
Dated: 07-31-2023