

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

Madelyn Mendoza,	)	
	)	
<i>Plaintiff,</i>	)	
	)	Case No.: 23-cv-2441
v.	)	
	)	Hon. Durkin
REYNALDO GUEVARA, et al,	)	Hon. Mag. Kim
	)	
<i>Defendants.</i>	)	

**MOTION TO WITHDRAW AS COUNSEL**

**NOW COMES** attorney of record Bhavani Raveendran of Romanucci & Blandin, LLC, hereby moving this Honorable Court for leave to withdraw as a member of Plaintiff's counsel for the consolidated cases, and, in support of this request, attorney Bhavani Raveendran states as follows:

1. The undersigned counsel, attorney Bhavani Raveendran of Romanucci & Blandin, LLC, represented Plaintiff, Ms. Mulero, in this matter and was granted leave to withdraw on March 10, 2025. See ECF No. 82 (*Mulero v. Guevara, et al*, 23-cv-4795).
2. As of the close of business March 7, 2025, attorney Bhavani Raveendran is no longer employed with the firm of Romanucci & Blandin, LLC.
3. Ms. Raveendran continues to receive filings and appear on the service list for both cases, despite having not filed an appearance directly in the matter filed by Ms. Mendoza.
4. Ms. Raveendran failed to file her motion to withdraw in the consolidated cases and seeks now to withdraw from both matters.

5. Additional attorneys of record currently represent both Plaintiffs in this matter, including Patrick Driscoll of Romanucci & Blandin, LLC, and they will continue diligently and ably representing the Plaintiff in this matter going forward. Accordingly, this motion will not prejudice the representation of Plaintiff in this matter, nor will this motion cause any undue delay in these proceedings.

**WHEREFORE, PREMISES CONSIDERED**, attorney of record Bhavani Raveendran of Romanucci & Blandin, LLC, respectfully requests the entry of an Order by this Honorable Court granting attorney Bhavani Raveendran leave to withdraw as a member of counsel for the consolidated Plaintiffs, in this matter, and for all such other and further relief which this Honorable Court may deem just and proper.

Date: March 18, 2025

Respectfully submitted,  
**ROMANUCCI & BLANDIN, LLC**

/s/ Bhavani Raveendran

---

One of Plaintiff's attorneys

Bhavani Raveendran (IL Attorney No.: 6309968)

**ROMANUCCI & BLANDIN, LLC**

321 North Clark Street, Suite 900

Chicago, IL 60654

+1 (312) 458-1000, *Main*

+1 (312) 458-1004, *Facsimile*

[braveendran@rblaw.net](mailto:braveendran@rblaw.net)

*An Attorney for Plaintiff*

**CERTIFICATE OF SERVICE**

The undersigned certifies that, on March 18, 2025, they electronically filed the foregoing document with the Clerk of the Court for the Northern District of Illinois by using the CM/ECF system, which will send notification of such filing to all CM/ECF participants.

Date: March 18, 2025

Respectfully submitted,  
ROMANUCCI & BLANDIN, LLC

/s/ Bhavani Raveendran

---

One of Plaintiff's attorneys